COTSWOLD
District Council

26 June 2026

e-mail: democratic@cotswold.gov.uk

DEPUTY LEADER AND CABINET MEMBER FOR HOUSING AND PLANNING DECISION MEETING

A meeting of the Deputy Leader and Cabinet Member for Housing and Planning Decision Meeting will be held in the Council Chamber - Council Offices, Trinity Road, Cirencester, GL7 1PX on **Tuesday, 30 June 2026 at 9.30 am.**

Jane Portman
Chief Executive

To: Members of the Deputy Leader and Cabinet Member for Housing and Planning Decision Meeting
(Councillors Juliet Layton)

Recording of Proceedings – The law allows the public proceedings of Council, Cabinet, and Committee Meetings to be recorded, which includes filming as well as audio-recording. Photography is also permitted.

As a matter of courtesy, if you intend to record any part of the proceedings please let the Committee Administrator know prior to the date of the meeting.

AGENDA

1. **Cabinet Member Introduction**
   To welcome the public and introduce all participants.

2. **Declarations of Interest**
   To receive any declarations of interest made by the Cabinet Member or any officers present.

3. **Officer Overview of the Report** (Pages 3 - 970)
   Officer to provide a brief verbal summary of the report with key details relating to the decision, providing any updates that need to be considered by the Cabinet Member when taking the decision.

   To agree CDC responses to Neighbourhood Plan consultations for
   Moreton (Reg. 16), Cirencester (Reg. 16) and Chipping Campden (Reg. 16).

4. **Confirmation of Comments**
   Confirmation of comments received by officer or Democratic Services.

5. **Public Questions**
   The Cabinet Member may allow members of the public present at the meeting to speak or make representations. However, all questions must relate directly to the decision being discussed. If a question is deemed irrelevant by the Cabinet Member the member of the public will be advised where to direct their question.

6. **Cabinet Member Questions**
   The Cabinet Member may request clarifications on the report and the proposed decision, including any alternative options for consideration.

7. **Decision**
   The Cabinet Member will verbally confirm the decision, stating whether they:
   - Accept the recommendations of the officer,
   - Decide to take a different decision contrary to the officer's recommendation, or
   - Decide to refer the decision to a meeting of Cabinet.

   The Cabinet Member must inform the Democratic Services Officer of the reason for the decision, which will be officially recorded on the Decision Notice.

(END)

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Council name	**COTSWOLD DISTRICT COUNCIL**
Name and date of Committee	**CABINET MEMBER FOR HOUSING AND PLANNING DECISION MEETING, 30 JUNE 2026**
Subject	**MORETON, CIRENCESTER AND CHIPPING CAMPDEN NEIGHBOURHOOD PLANS**
Wards affected	**Moreton-in-Marsh:** Moreton East, Moreton West **Cirencester:** Abbey, Chesterton, Four Acres, New Mills, St. Michael's, Stratton, The Beeches, Watermoor **Chipping Campden:** Campden & Vale
Accountable member	Juliet Layton, Deputy Leader and Cabinet Member for Housing and Planning Email: juliet.layton@cotswold.gov.uk
Accountable officer	Mark Harrison, Senior Local and Neighbourhood Planning Policy Officer Email: mark.harrison@cotswold.gov.uk
Report author	Mark Harrison, Senior Local and Neighbourhood Planning Policy Officer Email: mark.harrison@cotswold.gov.uk
Summary/Purpose	**Moreton** 1. To decide on the CDC response (Annex A) to the Reg. 16 Moreton NP consultation. 2. To decide that CDC will procure through a bid process an Independent Examiner to undertake examination of the Moreton NP (Reg. 17). The appointment must be consented by the qualifying body (Moreton-in-Marsh Town Council). 3. Confirm that the comments agreed at part 1 (Annex A) and those submitted by other stakeholders (Annex H; collated and redacted), and the submission documents for Moreton (Annexes B-G), will be sent to the IE once appointed.

	Cirencester 4. To decide on the CDC response (Annex I) to the Reg. 16 Moreton NP consultation. 5. To decide that CDC will procure through a bid process an Independent Examiner to undertake examination of the Cirencester NP (Reg. 17). The appointment must be consented by the qualifying body (Cirencester Town Council). 6. Confirm that the comments agreed at part 1 (Annex I) and those submitted by other stakeholders (Annex O; collated and redacted), and the submission documents for Cirencester (Annexes J-N), will be sent to the IE once appointed. **Chipping Campden** 7. To decide on the response (see para 25) to the Examiner's recommended modifications (Annex R) to the Chipping Campden Neighbourhood Plan, to ensure it meets the basic conditions. 8. To approve a Referendum on the Chipping Campden Neighbourhood Plan (with accepted modifications), on Thursday 13 August 2016.
Annexes	**Annex A** – Moreton Reg 16 Consultation CDC Comments **Annex B** – Moreton NP Reg 16 Plan Document **Annex C** – Moreton NP Basic Conditions Statement **Annex D –** Moreton Consultation Statement **Annex E –** Moreton Equalities Impact Assessment **Annex F –** Moreton HRA Screening **Annex G** – Moreton SEA Screening **Annex H –** Moreton Reg 16 Consultation Reps **Annex I –** Cirencester Reg 16 Consultation CDC Comments **Annex J –** Cirencester NP Reg 16 Plan Document **Annex K –** Cirencester Basic Conditions Statement **Annex L –** Cirencester Consultation Statement

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	Annex M – Cirencester HRA Screening **Annex N –** Cirencester SEA Screening **Annex O –** Cirencester Reg 16 Consultation Reps **Annex P –** Chipping Campden NP Reg 16 Plan Document **Annex Q –** Chipping Campden Examiner Fact Check Report **Annex R –** Chipping Campden Examiner Final Report (replaces Annex Q)
Recommendation(s)	That the Cabinet Member for Housing and Planning resolves: **Moreton** 1. To approve the CDC response (Annex A) to the Reg. 16 Moreton NP consultation. 2. To confirm that CDC will procure through a bid process an Independent Examiner to undertake examination of the Moreton NP (Reg. 17). The appointment must be consented by the qualifying body (Moreton-in-Marsh Town Council). 3. To confirm that the comments agreed at part 1 (Annex A) and those submitted by other stakeholders (Annex H; collated and redacted), and the submission documents for Moreton (Annexes B-G), will be sent to the IE once appointed. **Cirencester** 4. To approve the CDC response (Annex I) to the Reg. 16 Cirencester NP consultation. 5. To confirm that CDC will procure through a bid process an Independent Examiner to undertake examination of the Cirencester NP (Reg. 17). The appointment must be consented by the qualifying body (Cirencester Town Council). 6. To confirm that the comments agreed at part 1 (Annex I) and those submitted by other stakeholders (Annex O; collated and redacted), and the submission documents for Cirencester (Annexes J-N), will be sent to the IE once appointed.

	Chipping Campden 7. To consider (see para 25 below) the Examiner's recommended modifications (Annex Q) to the Chipping Campden Neighbourhood Plan, to ensure it meets the basic conditions. 8. To approve a Referendum on the Chipping Campden Neighbourhood Plan (with accepted modifications), on Thursday 13th August 2016.
Corporate priorities	**All of the corporate priorities are captured by the draft Neighbourhood Plan:** • Delivering Good Services • Responding to the Climate Emergency • Delivering Housing • Supporting Communities • Supporting the Economy
Key Decision	**NO** Whilst a Neighbourhood Plan could have a significant impact in regards part 2, in their current guises the proposed plans are not deemed to have a significant impact on the planning framework, particularly as none contain housing allocations**.**
Exempt	**NO**

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Consultees/ Consultation	The responses (Annex A/I) are specific to Cotswold District Council. We have consulted internally with officers who have specialist expertise in specific planning topics, as listed in the annexes. A comprehensive list of local, national and statutory consultees was prepared, by CDC, and informed of the Reg. 16 consultations for Moreton and Cirencester. Electoral Services have been consulted on the proposed Referendum Date for Chipping Campden.

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Moreton

1. EXECUTIVE SUMMARY

1.1 The Council should provide a response to the Moreton-in-Marsh draft Neighbourhood Plan (Reg. 16). A draft response for approval is at Annex A.

2. BACKGROUND

2.1 Moreton Town Council have prepared a draft Neighbourhood Plan 2018-2043. There is currently a public consultation from Thursday 16 April until Friday 29 May 2026.

2.2 This Reg. 16 consultation is the responsibility of CDC, and we have consulted other relevant stakeholders, statutory consultees, and people with local interests identified from Reg. 14.

2.3 Comments will be collated and redacted by CDC. Once an Independent Examiner is procured, the comments will be passed on to the IE who will consider them, along with the contents of the plan, and evidence provided, to determine whether the plan meets (with or without modifications) the basic conditions.

3. MAIN POINTS

Process

3.1 Once a draft neighbourhood plan has gone through its Reg 16 consultation, CDC should source an Examiner. The Examiner will consider the submitted documents and any comments made during the consultation period on the submitted plan.

3.2 The Independent Examiner will examine whether the plan meets the 'Basic Conditions' and other relevant legal requirements (e.g. consultation).

3.3 The Independent Examiner may recommend that the plan proceed to the referendum stage (i.e. that it meets all the legal requirements) or may suggest that modifications are needed to the plan before it can proceed to the referendum.

3.4 Following receipt of the recommendations, the next steps will be for another Cabinet Member Decision Meeting to decide on the following:

- Reg 18: Publication of the Examination Report and CDC Decision Statement;

- Arrange a Referendum for Moreton parish to vote on adopting the Neighbourhood Plan;
- Making (or adoption) of the Plan if a majority (>50%) support its adoption (this decision could be deferred to a later meeting).

Procurement

3.5 The Officer will instruct Legal Services (Publica) for procurement, and a tender document will be prepared with details of the bidding process and how bids will be assessed and decided by the Officer.

3.6 A tender document will be advertised on a relevant page of the CDC website, and shared with known planning consultancies offering this service incl. Intelligent Plans and Examinations Ltd who have completed examination of six previous plans for CDC.

3.7 The Officer will also use the NPIERS service (operated by RICS) which is an Examiner finder service. However, the Officer will have to complete their application form rather than share a tender document. Any examiners offering their services through NPIERS will still be assessed on the same basis as any consultants, except NPIERS examiners have a set daily rate. An NPIERS examiner will still have to agree to CDC's T&Cs.

3.8 In deciding on an Examiner, Paragraph 7 of Schedule 4B of the Town and Country Planning Act 1990 applies, particularly that the person appointed:

a) Is independent of the qualifying body and the authority;
b) Does not have an interest in any land that may be affected; and
c) Has appropriate qualifications and experience.

3.9 As the qualifying body, Moreton Town Council must consent to the appointment. As such, the Officer can share all bids and/ or make recommendations with the Town Council.

4. ALTERNATIVE OPTIONS

4.1 The Council does not have to respond to the Reg. 16 consultation. However, an Examiner of the plan could rightly question this approach, and would likely insist on CDC providing comments, which would slow the examination process.

4.2 The Council could take a different approach to the bid process, e.g. only inviting bids from planning consultancies, or only using the NPIERS Examiner finder service. A hybrid approach is deemed fairest and likely to receive the most bids to give choice.

5. CONCLUSIONS

5.1 The response aims to provide supportive comments or queries to support Moreton Town Council in preparing a Neighbourhood Plan that meets the basic and legal requirements, whilst reflecting the objectives of their community.

5.2 It is recommended that the Cabinet Member for Housing and Planning resolves that CDC will procure through a bid process an independent examiner, suitably qualified and experienced, to undertake examination of the Moreton Neighbourhood Plan. The appointment must be consented by the qualifying body (Moreton Town Council).

6. FINANCIAL IMPLICATIONS

6.1 None direct.

6.2 The Council already have financial obligations towards the procedural elements of Neighbourhood Planning following Reg. 15. Some or all of this can be reclaimed from the Government (MHCLG).

6.3 Officer support towards Neighbourhood Planning is already budgeted for.

7. LEGAL IMPLICATIONS

7.1 None direct.

7.2 Once adopted the Neighbourhood Plan must be considered as part of relevant planning applications, and planning is a statutory function for Cotswold District Council.

8. RISK ASSESSMENT

8.1 As there are no legal nor financial responsibilities in the Council providing this response, the sole risk at this stage would be reputational as the comments can be made public through the Consultation Statement and publication of Neighbourhood Plan documents for examination.

9. EQUALITIES IMPACT

9.1 Under equality legislation, the Council has a legal duty to pay 'due regard' to the need to eliminate discrimination and promote equality in relation to:

- Race
- Disability
- Gender, including gender reassignment
- Age
- Sexual Orientation
- Pregnancy and maternity
- Religion or belief

9.2 The response would indicate where the draft Neighbourhood Plan could discriminate against any of the above; there are none identified at this stage.

10. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

10.1 Policy 1 is focused on Climate Adaptation, and Policy 2 is focused on Managing Flood Risk; both are considered in the response (Annex B).

10.2 Throughout preparation of the plan, and in the responses provided, consideration is given to the sustainable balance of development in line with national policy and guidance, including climate change/ adaptation.

11. BACKGROUND PAPERS

Annex A – Moreton Reg 16 Consultation CDC Comments
Annex B – Moreton NP Reg 16 Plan Document
Annex C – Moreton NP Basic Conditions Statement
Annex D – Moreton Consultation Statement
Annex E – Moreton Equalities Impact Assessment
Annex F – Moreton HRA Screening
Annex G – Moreton SEA Screening
Annex H – Moreton Reg 16 Consultation Reps

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Cirencester

12. EXECUTIVE SUMMARY

12.1 The Council should provide a response to the Cirencester draft Neighbourhood Plan (Reg. 16). A draft response for approval is at Annex H.

13. BACKGROUND

13.1 Cirencester Town Council have prepared a draft Neighbourhood Plan (2041). There is currently a public consultation from Thursday 16 April until Friday 29 May 2026.

13.2 This Reg. 16 consultation is the responsibility of CDC, and we have consulted other relevant stakeholders, statutory consultees, and people with local interests identified from Reg. 14.

13.3 Comments will be collated and redacted by CDC. Once an Independent Examiner is procured, the comments will be passed on to the IE who will consider them, along with the contents of the plan, and evidence provided, to determine whether the plan meets (with or without modifications) the basic conditions.

14. MAIN POINTS

Process

14.1 Once a draft neighbourhood plan has gone through its Reg 16 consultation, CDC should source an Examiner. The Examiner will consider the submitted documents and any comments made during the consultation period on the submitted plan.

14.2 The Independent Examiner will examine whether the plan meets the 'Basic Conditions' and other relevant legal requirements (e.g. consultation).

14.3 The Independent Examiner may recommend that the plan proceed to the referendum stage (i.e. that it meets all the legal requirements) or may suggest that modifications are needed to the plan before it can proceed to the referendum.

14.4 Following receipt of the recommendations, the next step will be for another Cabinet Member Decision Meeting to decide on the following:

- Reg 18: Publication of the Examination Report and CDC Decision Statement;

- Arrange a Referendum for Cirencester parish to vote on adopting the Neighbourhood Plan;
- Making (or adoption) of the Plan if a majority (>50%) support its adoption (this decision could be deferred to a later meeting).

Procurement

14.5 The Officer will instruct Legal Services (Publica) for procurement, and a tender document will be prepared with details of the bidding process and how bids will be assessed and decided by the Officer.

14.6 A tender document will be advertised on a relevant page of the CDC website, and shared with known planning consultancies offering this service incl. Intelligent Plans and Examinations Ltd who have completed examination of six previous plans for CDC.

14.7 The Officer will also use the NPIERS service (operated by RICS) which is an Examiner finder service. However, the Officer will have to complete their application form rather than share a tender document. Any examiners offering their services through NPIERS will still be assessed on the same basis as any consultants, except NPIERS examiners have a set daily rate. An NPIERS examiner will still have to agree to CDC's T&Cs.

14.8 In deciding on an Examiner, Paragraph 7 of Schedule 4B of the Town and Country Planning Act 1990 applies, particularly that the person appointed:

a) Is independent of the qualifying body and the authority;

b) Does not have an interest in any land that may be affected; and

c) Has appropriate qualifications and experience.

14.9 As the qualifying body, Cirencester Town Council must consent to the appointment. As such, the Officer can share all bids and/ or make recommendations with the Town Council.

15. ALTERNATIVE OPTIONS

15.1 The Council does not have to respond to this consultation. However, an Examiner of the plan could rightly question this approach, and would likely insist on CDC providing comments, which would slow the examination process.

15.2 The Council could take a different approach to the bid process, e.g. only inviting bids from planning consultancies, or only using the NPIERS Examiner finder service. A hybrid approach is deemed fairest and likely to receive the most bids to give choice.

16. CONCLUSIONS

16.1 The response aims to provide supportive comments or queries to support Cirencester Town Council in preparing a Neighbourhood Plan that meets the basic and legal requirements, whilst reflecting the objectives of their community.

16.2 It is recommended that the Cabinet Member for Housing and Planning resolves that CDC will procure through a bid process an independent examiner, suitably qualified and experienced, to undertake examination of the Cirencester Neighbourhood Plan. The appointment must be consented by the qualifying body (Cirencester Town Council).

17. FINANCIAL IMPLICATIONS

17.1 None direct.

17.2 The Council already have financial obligations towards the procedural elements of Neighbourhood Planning following Reg. 15. Some or all of this can be reclaimed from the Government (MHCLG).

17.3 Officer support towards Neighbourhood Planning is already budgeted for.

18. LEGAL IMPLICATIONS

18.1 None direct.

18.2 Once adopted the Neighbourhood Plan must be considered as part of relevant planning applications, and planning is a statutory function for Cotswold District Council.

19. RISK ASSESSMENT

19.1 As there are no legal nor financial responsibilities in the Council providing this response, the sole risk at this stage would be reputational as the comments can be made public through the Consultation Statement and publication of Neighbourhood Plan documents for examination.

20. EQUALITIES IMPACT

20.1 Under equality legislation, the Council has a legal duty to pay 'due regard' to the need to eliminate discrimination and promote equality in relation to:

- Race
- Disability
- Gender, including gender reassignment
- Age

- Sexual Orientation
- Pregnancy and maternity
- Religion or belief

20.2 The response would indicate where the draft Neighbourhood Plan could discriminate against any of the above; there are none identified at this stage.

21. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

21.1 Throughout preparation of the plan, and in the responses provided, consideration is given to the sustainable balance of development in line with national policy and guidance, including climate change/ adaptation.

22. BACKGROUND PAPERS

Annex I – Cirencester Reg 16 Consultation CDC Comments
Annex J – Cirencester NP Reg 16 Plan Document
Annex K – Cirencester Basic Conditions Statement
Annex L – Cirencester Consultation Statement
Annex M – Cirencester HRA Screening
Annex N – Cirencester SEA Screening
Annex O – Cirencester Reg 16 Consultation Reps

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Chipping Campden

23. EXECUTIVE SUMMARY

23.1 The Council must decide on the Examiner's Recommendations and arrange a referendum on the Chipping Campden Neighbourhood Plan.

24. BACKGROUND

24.1 CDC approved a Regulation 16 consultation on the Chipping Camden Neighbourhood Plan, which was undertaken and ended on 15th August 2025.

24.2 The responses have been received, collated and redacted. These along with the submission documents of the Neighbourhood Plan were passed to an Independent Examiner (once procured) to make recommendations.

24.3 The examination (including a hearing) has now concluded, and on 12th June 2026, CDC received the Examiner's Report, with recommended modifications to make in order for the Neighbourhood Plan to meet the basic conditions.

25. MAIN POINTS

Recommended Modifications

Policy 1 – *see para 7.19 of Annex Q*

25.1 Support this recommendation, which provides greater clarity in supporting sustainable development, relevant to Chipping Campden's town centre.

Policy 2 – *see para 7.28 of Annex Q*

25.2 Agree with the rationale to remove retail aspects of the community facilities policy. Support the important safeguard of residential amenity in regards land for human burial purposes.

Policy 3 – *see para 7.35 of Annex Q*

25.3 Agree with the further clarity provided by this recommendation, in order to achieve good design and sustainable development.

Policy 4 – *see para 7.39 of Annex Q*

25.4 Do not agree with this recommendation, and propose to partially dismiss it.

25.5 The Examiner supports the identification of all the non-designated heritage assets proposed by Chipping Campden Town Council. The IE has proposed the following wording modification to the policy:

'The following features are designated as non-designated heritage assets:'

to

'The Plan identifies the following features as non-designated heritage assets for the purpose of the application of Policy EN12 of the Local Plan'.

25.6 The first part of the policy: *The Plan identifies the following features as non-designated heritage assets* can be supported. Particularly the change of the term 'designated' to 'identifies'; as the original term conflicts with the fact they are non-designated heritage assets (i.e. not listed).

25.7 However, the second part of the recommended modification should be dismissed: *for the purpose of the application of Policy EN12 of the Local Plan.*

25.8 Heritage assets are covered thoroughly by Chapter 16 of the NPPF, and in the glossary refers to heritage assets as those that are designated or identified by a local planning authority (which would include through adoption of a Neighbourhood Plan).

25.9 One of the basic conditions is:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;

25.10As proposed, this restricts the identification of these NDHAs only to circumstances where Policy EN12 can be applied, and potentially not in circumstances described in Chapter 16 of the NPPF. Policy EN12 would apply anyway even if not specifically referenced, and will soon be replaced/ retitled.

25.11 Considered that the second part of the modification is not necessary in order to meet the basic conditions, and would better meet the basic condition highlighted above, and continue to contribute to sustainable development, without this part.

25.12 Consulted Justin Ayton (Senior Conservation and Design Officer at CDC) who stated:

25.13 'Non-designated heritage assets' are a type of 'Heritage asset' as defined in the Glossary of the N.P.P.F.:

> "*Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and* ***assets identified by the local planning authority (including local listing)***"

25.14 Locally-listed assets are non-designated heritage assets, as is confirmed in Historic England's advice note 7, Local Heritage Listing: Identifying and Conserving Local Heritage:

> "*Local heritage lists are lists of non-designated heritage assets (NDHAs) which, due to their local heritage significance, have been identified as being of value to a particular place and the community who live and work there. All NDHAs (not just those included in local heritage lists) are afforded a degree of protection through the planning system, although this is less than the protection given to designated heritage assets'* (paragraph 1).

25.15 Consequently, non-designated heritage assets are a type of heritage asset for the purposes of the NPPF, the Local Plan, and any and all relevant national & local policy & guidance; not merely Policy EN12 alone.

25.16 On this basis, and for clarity, Policy 4 should start with this wording:

The Plan identifies the following features as non-designated heritage assets:

[followed by the list of NDHAs]

Policy 5 – *see para 7.49 of Annex Q*

25.17 Agree with the need to modify this policy, particularly deleting part 1 as explained by the Examiner in para 7.47. Also agree with rationalising the criteria of part two.

25.18 However, the re-written policy is not clear whether there is a sequentially preferential order of:

- Campden Local Nature Recovery Areas
- Elsewhere in CC Parish
- Locations contributing to Gloucs LNRS

Or if any of these are equally as acceptable as each other. Confusion arises through the term "first option", but then the use of "or" thereafter.

25.19 The IE has been asked to clarify this wording through the fact-checking process.

Policy 6 – *see para 7.96 of Annex Q*

25.20 Understand the rationale for the deletion of LGS19 (Hoo West) and LGS20 (Hoo East). As mentioned in the hearing, multiple fields and arbitrary boundaries (not following natural features or field boundaries) has probably lead to the Examiner determining it is not local in character.

25.21 The recommendation to delete LGS21 (The Cley) is more tenuous. However, believe the Examiner recognises this, and explains clearly culminating in the conclusion at para 7.83.

25.22 The Examiner recommends to retain LGS22 (The Craves) at para 7.94.

25.23 Can support the additional criteria to the policy.

26. ALTERNATIVE OPTIONS

26.1 CDC could accept or reject any/all recommendation modifications if they feel it is not necessary in order for the Plan to meet the Basic Conditions. CDC have procured an experienced Independent Examiner to make these recommendations.

27. CONCLUSIONS

27.1 It is recommended that the modifications of Policies 1-3, 5 and 6 are accepted by CDC, and integrated into the Neighbourhood Plan.

27.2 It is recommended that modification 4 is partially accepted and partially dismissed.

Referendum

27.3 Upon making this decision, it triggers a 56 day window in which to hold a referendum. This is dictated by Regulation 2A in the Neighbourhood Planning (Referendums) Regulations 2012. CDC should also provide 28 days' notice of a referendum. Therefore, in consultation with Electoral Services, Thursday 13th August is the optimal date. This should also avoid a Local Plan consultation to follow.

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28. FINANCIAL IMPLICATIONS

28.1 The Council already have financial obligations towards the procedural elements of Neighbourhood Planning following Reg. 15, including a referendum. Some or all of this can be reclaimed from the Government (MHCLG).

28.2 Officer support towards Neighbourhood Planning is already budgeted for.

29. LEGAL IMPLICATIONS

29.1 Once adopted the Neighbourhood Plan must be considered as part of relevant planning applications, and planning is a statutory function for Cotswold District Council.

30. RISK ASSESSMENT

30.1 CDC could fund the referendum, and other elements of the Plan process, only for the Plan to be withdrawn or voted 'NO', meaning some or all of the funds would not be able to be claimed back from the Government.

31. EQUALITIES IMPACT

31.1 Under equality legislation, the Council has a legal duty to pay 'due regard' to the need to eliminate discrimination and promote equality in relation to:

- Race
- Disability
- Gender, including gender reassignment
- Age
- Sexual Orientation
- Pregnancy and maternity
- Religion or belief

31.2 The Examiner has ensured the Plan meets this legal duty, and make recommendations if it appears to discriminate.

32. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

32.1 The Plan contains policies on Nature Recovery Areas and Local Green Spaces (some of which are proposed for their rich wildlife) (see Annex A).

32.2 The Examiner has ensured the Plan does not contradict the sustainable balance of development in line with national policy and guidance, including climate change/ adaptation.

33. BACKGROUND PAPERS

Annex P – Chipping Campden NP Reg 16 Plan Document
(Full library of NP evidence documents can be found here).

Annex Q – Chipping Campden NP Examiner's Fact Check Report

Annex R - Chipping Campden NP Examiner's Final Report (replaces Annex Q).

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Moreton-in-Marsh Neighbourhood Plan
c/o Peter Richardson
Moreton-in-Marsh Town Council

clerk@moretoninmarshtowncouncil.gov.uk
By e-mail only

Enquiries to: Mark Harrison
Senior Planning Policy Officer
mark.harrison@cotswold.gov.uk

14th May 2026

Dear Mr Richardson,

Moreton-in-Marsh Neighbourhood Plan
Response to Reg 16 draft Neighbourhood Plan consultation

Firstly, I would like to congratulate the Town Council and their Steering Group on reaching this stage in plan preparation and for creating a well-considered draft plan for the future of the parish.

I have consulted colleagues throughout the District Council on the draft plan and have received a number of comments from various service areas. The District Council's comments are presented in the schedule that follows this letter with internal consultees comments embedded with our own.

Comments have been made about both the supporting text, which sets the context and justification for the policies, and on the policies proposed for inclusion in the Plan.

I hope that you will see these comments as critical support. They are intended to inform modification to the Plan so that it best meets the expectation of the Town Council in terms of the future determination of development proposals, and, crucially, that the Plan can proceed to independent examination once it has been submitted, with a greater expectation of a positive outcome.

I hope the comments made by the District Council are helpful in reaching a conclusion to plan preparation. We will, of course, continue to support the Town Council and Steering Group with advice as necessary and with practical support.

Finally, I would advise that the comments made by the District Council in response to this consultation on the pre-submission draft plan do not constitute a *formal* opinion about whether the Plan as currently drafted meets the basic conditions.

The District Council is not required to issue a decision statement in respect of that matter until the independent examination has been completed (which follows this consultation).

Yours sincerely,

Mark Harrison

Mark Harrison BSc(Hons) MA MRTPI
Senior Planning Policy & Neighbourhood Plans Officer
Planning Policy and Infrastructure
Cotswold District Council

P: Cotswold District Council, Trinity Road, Cirencester, GL7 1PX
T: CDC colleagues chat to me on Teams
E: mark.harrison@cotswold.gov.uk
W: Planning Policy webpages

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Regulation 16 Consultation

Regulation 16 of the Neighbourhood Planning Regulations require the draft plan proposal to be the subject of consultation after submission (Reg 15) to the local authority for independent examination. The consultation should last at least 6 weeks.

A consultation for the plan is being undertaken from Thursday 16th April to Friday 29th May. Comments for the District Council are provided as relevant on the day of 14th May 2025.

Consultation requirements include publicising the draft plan to people who live, work or run business in the area. The publicity must include details of the proposed neighbourhood plan, where and when it may be viewed, and how to make comments on the plan and by what date.

Certain statutory bodies must be consulted, including the district council (as the local planning authority), the Environment agency, Natural England and Historic England. It is also advisable to consult and local business or community organisations, such as chambers of commerce, civic societies and local trusts.

Representations and Modifications

Representations made during the consultation will be collated and redacted by CDC, and sent to an Independent Examiner (once procured). They will then appraise the comments, the Plan, and supporting evidence to make recommendations, and if necessary modifications, on whether the plan meets the Basic Conditions in order for the plan to be adopted by CDC.

Considerations

The Basic Conditions an Examiner will consider for a Neighbourhood Plan are as follows:

- National policy compliance
- Contribution to achievement of sustainable development
- General conformity with “strategic policy”
- Compatible with EU obligations (e.g. SEA)
- Does not breach habitats regulations

MHCLG guidance (June 2025) on plan-making also requires:

- Clarity and certainty;
- Detailed policies map(s);
- Sufficient evidence and justification.

Comments provided by CDC will be based upon these considerations, although as above a *formal* opinion on the basic conditions cannot be made until after independent examination.

Conformity with Strategic Policy

Please note that an emerging Neighbourhood Plan can only be considered against policies in the adopted (i.e. current) Cotswold District Council Local Plan 2011-2031 (adopted in August 2018). Although a Local Plan review is underway, this currently carries no weight.

However, of note is that as part of the Local Plan review, consultations and a feasibility study have been undertaken regarding housing development in Moreton. This can help understand why no housing sites are proposed for allocation in the Neighbourhood Plan despite a district-wide and local need. There is no requirement for Neighbourhood Plans to allocate housing sites.

Comment Schedule

Policy No.	**Policy Name**	**CDC Comments**
n/a	General comment	For clarity the Policy number, title and text should be within a single box, excluding the objective.
1	Climate Adaptation and Energy Efficiency in Developments	Change of the term *proposals* has been made since Reg 14, as suggested. Criterion (b) is set out in LP Policy INF10 1(b) and duplication is not required. Criteria (c) and (f) could be moved to supporting text. They express encouragement for such development but do not effectively change policy position. The term '*where relevant or appropriate',* has been made since Reg 14, as suggested. Criterion (e) has been reworded since Reg 14, as suggested. Had suggested at Reg. 14 making prescriptive the requirement e.g. 10% or 20% of spaces.
2	Managing Flood Risk ***Jo Corbett – Senior Policy Officer*** *has*	This policy largely repeats Local Plan and national planning policy, including assessing all sources of flood risk and reference to SuDs. There is a specific reference to groundwater and

	made these comments.	which the NDP might need to clarify /evidence in the justification if not already.
3	Housing Mix	Threshold has been reduced from six dwellings to all dwellings, since Reg. 14, as suggested. The Housing Needs Analysis should now be visible as Appendix H. Would have preferred Lifetime Home Standards to be updated to M4(2) building regulations, rather than removed completely. Could 5 be *fully serviced* land? e.g. power grid, water, sewage connections. Criterion (b) could be removed, duplicates (c) and (1).
4	Affordable Housing	The term '*tenure blind,* has been added since Reg 14, as suggested. Criterion (b) has been amended since Reg 14, as suggested. The 'white box' following the policy now refers to the HomeSeeker Plus (or any subsequent) policy; and that the Local Connection Criteria (white box) is supplementary to the HomeSeeker Plus policy (enabled by para 34.1 of GCC's policy document). However, the white box should also indicate the 'surrounding parishes' as mentioned in para 34.1. Criterion (c) has been amended, but as written still applies to all proposals, should it be only proposals that include affordable housing? Criterion (d) our understanding is this would contradict national legislation. Could instead propose Discounted Market Sale (DMS) which can tie a perpetual discount to the land.
5	Well Designed Housing and Places	Previous Reg 14 criterion (b) has been deleted as superfluous to (a). Reference to a Design Guide has been removed since Reg 14, as suggested.

		Criterion (e) – depends on how busy the road is, whilst earthwork barriers are appropriate alongside busy/ main roads, on a quitter road development facing onto the road can enhance the streetscape. Criterion (f) Prefer that the term 'where appropriate' is reinstated from Reg. 14. Criterion (h) this has been altered, but better would be an assessment of supply/ demand for allotments. And would extending current sites/ allocating new sites be better than smaller allotments on each development site? Criterion (i) still advocate for these being centralised to the development e.g. village green concept with properties facing, as opposed to "wedges" or "empty plots".
6	Parking in Residential Developments	Please see comments below. Criterion (b) suggest garages are excluded from the count of the first parking space e.g. where 2 spaces must be provided, only 1 can be a garage space.
7	Brownfield First	Whilst this is a good objective, the policy criteria would not make any change to the determination of planning applications. No sites have been identified which could add to this policy.
8	Hard Infrastructure	Is it possible for criterion (d) to be stronger e.g. *before* the sale of any dwellings?
9	Soft Infrastructure	Criterion (b) or if the capacity can be increased through the new development?
10	Principal Residence Housing	This policy seems disproportionately strong compared to the justification, and no specific evidence showing % in Moreton is provided.
11	Employment Land	Main employment locations in the parish are now outlined in the supporting text.

12	Small Business Units	What constitutes small? Does this apply up to a certain floorspace or number of employees? E.g. 200 sq. m. is a number likely to come forward in the new local plan.
13	Retail Provision	Moreton has a Key Retail Centre as set out in the retail hierarchy of Policy EC7. The policy proposes a new Core Retail Area. Reiterate that instead the Key Retail Centre boundary should be altered, which would be clearer, and ensure LP Policy EC7 still applies. There needs to be clear justification for the proposed locations of the boundary. Can the more transparent version of Figure 13 (seen elsewhere) be used.
14	Infrastructure Investment Priorities	
15	Local Green Spaces ***Lesley Davis – Planning Policy officer*** *has been consulted on this policy and comments embedded.*	Met with Moreton SG to revisit all Local Green Spaces proposed in Reg 14. Satisfied that these all meet the criteria for designation. Except perhaps no.5 Entrance to Fire Services College. Which version of the NPPF? (Para 75). Suggest at part (b) encouraging developers to engage with the TC as an early stage of the development process.
16	NDHAs ***Laurie Davis – Senior Conservation Officer*** *has been consulted on this policy and comments embedded.*	Criteria (b) and (c) have been removed since Reg 14 as suggested. The list of each NDHA should be listed in the policy; even if further detail is retained in an Appendix. Still not seeing any justification, assessments, or evidence for each that supports identification as an NDHA. Cannot support the inclusion of any without this information. Also to note that the identified non-designated heritage assets are not a definitive or exhaustive list, and that the Local Planning Authority could take a different view or identify further assets as part of the planning process. That disclaimer should be included somewhere.

17	Biodiversity	Numbering/ lettering needs reordering. Generally supportive of this policy, but criteria could be streamlined, duplicate wording in many places. Criterion (f) on Biodiversity Opportunity Areas (BOAs) has been removed from Reg 14. Criterion (h) other relevant policies in the development framework will apply regardless. Criterion (g) not clear how an applicant *"ensure the viability of the surrounding Cotswold National Landscape" ?*
18	Important Views	This policy has been amended. The views are now identified on the Policies Map. Support the wording of this policy, it is proportionate (not too onerous).
19	Development Boundary	The policy does not appear to alter the Development Boundary already set out in the Local Plan. Criterion (b) is not positively worded and does not support the principle of sustainable development, suggest removing.
20	Transport & Active Travel	

Comments from **Harrison Bowley, Head of Development Management (CDC)**:

With Policy 6, previously raised that the parking requirements are not consistent with Manual for Gloucestershire Streets:

Bedrooms	**MfGS (Rural)**	**NDP**
1	1	1
2	1	2
3	2	2
4	2	3
5+	3	4

Additional, visitor spaces are required at 1 space per 5 dwellings in MfGS, and 1 per 2 dwellings in the NDP. The MfGS requirements are a minimum so the NDP does not conflict with this, but I would question if there is a strong evidence base to support setting such high minimum requirements?

From a design/streetscape perspective, car dominance can create numerous issues, including large expanses of hardstanding and wider highways including layby style spaces. This all erodes the quality of design and inevitably reduces green space and street trees within development. It will also inevitably reduce density of developments. Criterion e of Policy 5 requires "*Wherever possible, developments should be screened from the road using earthworks, native species green hedging and/or trees for highway boundaries wherever possible and where these are in keeping with the existing streetscape.*" In practice, these objectives are unlikely to be compatible.

Could also consider this from a model shift perspective. The over-provision of car parking can undermine modal shift objectives where it encourages car ownership and car-based trips, particularly in locations where walking, cycling and public transport offer realistic alternatives which will be the case of parts of Moreton. Parking provision should therefore be evidence-based, proportionate to the accessibility of the site, and balanced against the need to promote sustainable transport and achieve good design.

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Moreton-in-Marsh Neighbourhood Plan

2018 - 2043

Regulation 16 Draft



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Foreword

Welcome to the Moreton-in-Marsh Neighbourhood Development Plan.

A Neighbourhood Plan is a community led initiative under the aegis of the Town Council which enables a community to play a much stronger role in shaping the area in which it lives and works. While it must align with the Cotswold District Local Plan, it can add detail important to the community. For example, it can put into policy:

- where we might choose to have new homes, shops and offices to be built
- the type, design and sustainability requirements for any new buildings
- the infrastructure that needs to be provided
- the protection of important local green spaces, important views and other community assets

In addition, it enables a local community to benefit from 25% of the revenues from the Community Infrastructure Levy arising from any development that takes place in the area.

The plan can also identify projects that the community perceives would benefit the town. Unfortunately, no funds are attached to this, but they do provide a very strong indication of what the community would like to see happen.

The Moreton-in-Marsh NDP covers the parish of Moreton-in-Marsh and will run up to 2043 (in line with the local plan). It has been driven by a working group made up of volunteers, a mix of local residents and local councillors. The working group began in 2018 and since then has held a number of events, surveys, workshops and exhibitions to understand the community needs and wishes.

Residents like the fact that Moreton is a small, friendly historic market town which provides a focus for shopping, hospitality, social activities and services such as healthcare for residents of the town and the surrounding villages. The town sits in a bucolic setting, surrounded by agriculture and countryside. The high street is the second broadest in the country and is lined with historic buildings of architectural value. The town is well connected as it is located at the crossroads of two main 'A' roads and has a railway station providing direct services to London and Hereford. All these factors make it very popular with locals and with tourists.

The High Street, the two business areas and people working from home are at the heart of the economy of the town, but agriculture and tourism are also extremely important, so it is key to the community that the character of the town is maintained or enhanced.

Generally, people like living in Moreton but there are a number of issues which the plan aims to address:

- Quality of Life
  There has been a very large and very rapid increase in housing in the town recently. Between the 2011 and 2021 censuses, the number of households and the population both grew by just under 50%. This is a massive increase in a short time and has put many aspects of life in the town under pressure.
- Infrastructure – is struggling and bringing increased health and safety risks.
  It is noted that the land allocated for housing in the Local Plan to 2031 has all been developed – and more.
- Water management – the local water treatment plant (owned by Thames Water) is already at capacity and is unable to cope even with current demand. It is noted that the CDC Local Plan referred to a 2015 water cycle study indicating that some upgrading was required – but none has been carried out.
    - While there are plans to upgrade the plant there are concerns when this might

happen (as it keeps being delayed and acknowledging Thames Water's current financial difficulties). The immediate impact has been excessive foul water discharges into the River Evenlode and an increased risk of flooding.

- Traffic – the two sides of the beautiful High Street are split by the A429, Fosse Way. This has now become so busy with the general increase in traffic, as well as the increase in local traffic, that it suffers from significant air and noise pollution and is often difficult to cross increasing the health and safety risks.
- Services – local health services (GP surgeries, dental services, etc.) have not grown at the same rate as the population and so have become difficult to access.
- Climate change and sustainability
    - Residents want a more sustainable town that is able to manage successfully the issues that are predicted from climate change – particularly extreme weather events
    - People value the town's close links with agriculture and the countryside and are keen to see this maintained and enhanced, not degraded, and support efforts to increase biodiversity.

The plan seeks to address these issues as far as it is able, and deliver the vision that the residents have for the town

"An attractive, vibrant and prosperous market town with a wide range of housing options
It benefits from excellent transport links, a network of safe walking and cycling routes
It successfully blends its role as a key retail and service centre for businesses, residents and visitors in a green, bio-diverse, low carbon environment."

We would like to acknowledge everyone that has helped to create this plan, not least the residents themselves for their participation in the various surveys, events, exhibitions and workshops. We would also like to thank everyone who has volunteered their time on the working group since its inception in 2018, the consultants who have helped us enormously and also the CDC officers who have helped us along the way.

Peter Richardson
Chair of the Neighbourhood Development Plan

Eileen Viviani
Vice-Chair of the Neighbourhood Development Plan

Introduction

This document represents the Neighbourhood Plan for Moreton-in-Marsh, for the period 2018 to 2043. The plan contains a vision for the future of Moreton-in-Marsh and sets out clear planning policies to realise this vision.

Purpose of the Plan

The principal purpose of the Neighbourhood Plan is to guide development within the neighbourhood area. It also provides guidance to anyone wishing to submit a planning application for development within the neighbourhood area. The process of producing a plan has sought to involve the community as widely as possible. The different topic areas are reflective of matters that are of considerable importance to Moreton-in-Marsh, its residents, businesses, and community groups.

Some of the Neighbourhood Plan policies are general and apply throughout the plan area, whilst others are site or area-specific and apply only to the appropriate areas illustrated on the relevant map. Once made, the policies of the plan form part of the development plan. Development should be carried out in accordance with the development plan, the policies of which should be taken as a whole.

The process of producing the Neighbourhood Plan has identified a number of actions which have not been included in the policies' sections. This is because these are not specifically related to land use matters and therefore sit outside the jurisdiction of a neighbourhood plan. These actions will be addressed by the Town Council outside of the neighbourhood plan process.

Policy Context

This document is the Neighbourhood Plan for Moreton-in-Marsh neighbourhood area, being one part of the development plan over the period 2018 to 2043, the other part being the Local Plan for Cotswold District Council 2011 - 2031[1].

Cotswold District Council (CDC), as the local Planning Authority, designated the Moreton-in-Marsh Neighbourhood Area in September 2018 to enable Moreton-in-Marsh Town Council to prepare the Neighbourhood Plan. The Plan has been prepared by the community through the Moreton-in-Marsh Neighbourhood Plan Steering Group (NPSG) on behalf of Moreton-in-Marsh Town Council.

The Moreton-in-Marsh Neighbourhood Plan has been prepared in accordance with the Town & Country Planning Act 1990[2], the Planning & Compulsory Purchase Act 2004[3], the Localism Act 2011[4] and the Neighbourhood Planning Regulations 2016[5]. The NPSG has prepared the plan to establish a vision for the future of the neighbourhood area and to set out how that vision will be realised through planning and controlling land use and development change over the plan period 2018 to 2043.

The map in *Figure 1* below shows the boundary of the Neighbourhood Plan area, which is contiguous with the parish boundary.

[1] *Cotswold District Council Local Plan 2011-2013*
[2] *Town and Country Planning Act 1990*
[3] *Planning and compulsory Purchases Act 2004*
[4] *Localism Act 2011*
[5] *Neighbourhood Planning Regulations 2016*

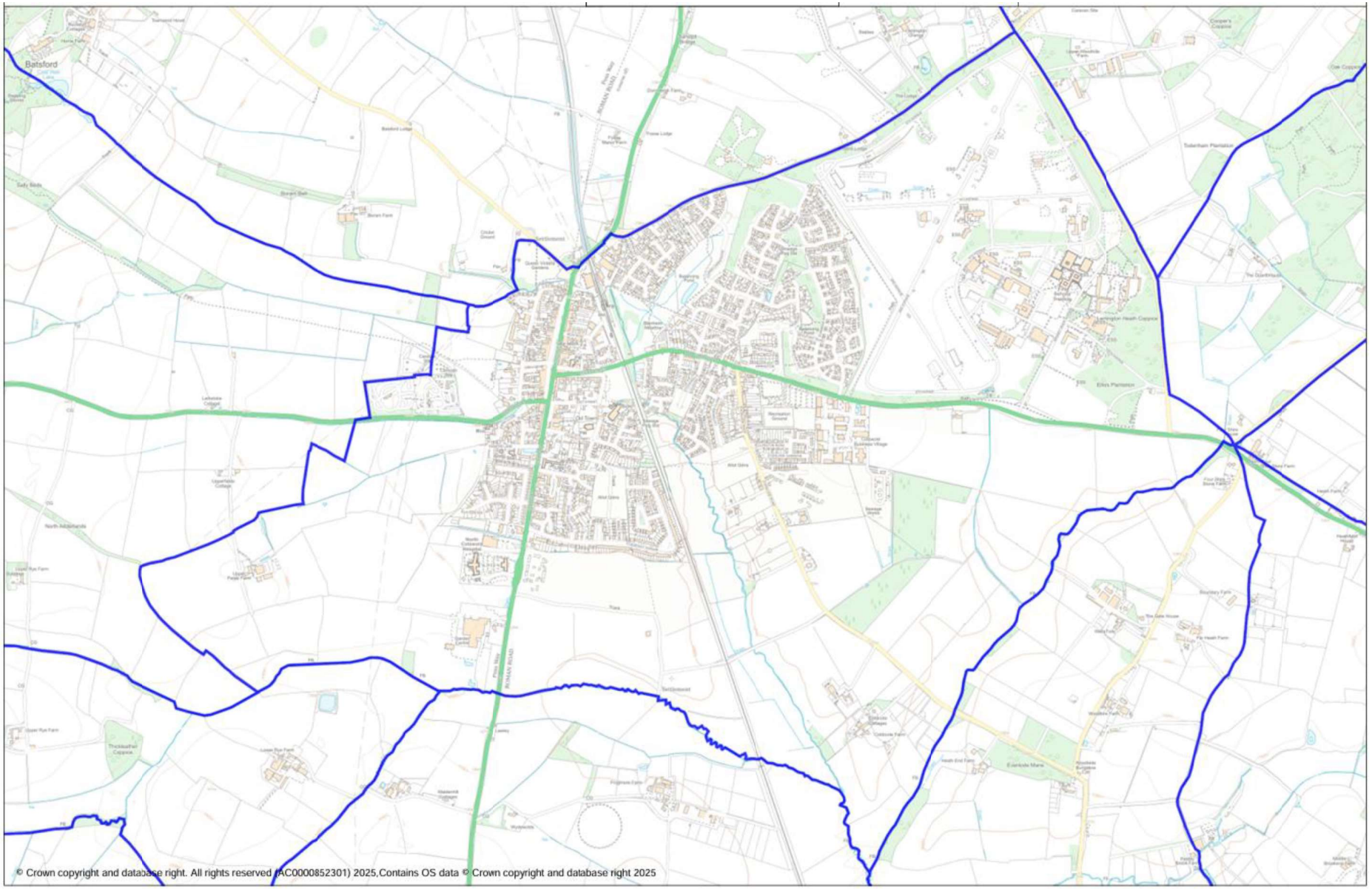


Figure 1 Neighbourhood Plan Boundary Map

About Moreton-in-Marsh

Moreton-in-Marsh was first settled during the Iron Age which began around 750BC and lasted until the coming of the Romans in AD43. Roman pottery and coins have been found at the site which is not surprising since the settlement borders the Fosse Way, built by the Romans to link Lincoln and Exeter. Moreton is first mentioned as a Saxon settlement around 577 AD and just before the Norman Conquest of 1066 it was transferred to the ownership of Westminster Abbey. It was granted its market charter in 1226, and this encouraged the growth of the market town with its wide main street, narrow burgage plots and back lanes. There still is a busy market today attracting many visitors every Tuesday throughout the year.

When Moreton-in-Marsh became the property of Westminster Abbey it was still a small village, but Abbot Richard of Barking saw the possibility of exploiting its position next to the Fosse Way and began developing Moreton as a medieval market town between 1222 and 1246. The new town was built on common land bordering the Fosse Way close to the original Saxon settlement. St David's Church is in the centre of the original settlement, which is still called Old Town. The distinctive long, wide High Street was part of this development and was created to accommodate the medieval markets.

The development helped the town's wool and cloth-making economy to thrive during this period, enabling the building of the elegant 18th century inns and houses which line the High Street. After a thousand years of church ownership the estate was sold in 1856.

As the name implies, Moreton-in-Marsh lies mainly on open moorland and parts of the parish, especially near the church where the earliest settlement lay, are marshy and used to be subject to flooding. The south and east boundaries of the parish are formed by two branches of the River Evenlode.

Open fields lay on the east and west sides of the Fosse Way until the enclosures in the 17th century and after the 1821 Inclosure Act. The parish has always had a considerable area of meadow, the demesne meadow lying on the west side and the common meadow, usually called Moreton Heath, lying in the north-east. During the Second World War the northeast part was used as an airfield which was closed in 1959. It was then repurposed and in 1962 became a Fire Service training centre which is still active today.

The placing of a main railway station in Moreton encouraged further growth such that by the end of the 19th century the number of houses had increased by 50%.

Moreton-in-Marsh Today

Today, Moreton-in-Marsh is a thriving market town with just over 5,000 residents. It is a principal settlement in the North Cotswolds, being located in the northeast of Gloucestershire and bordering three other counties, Oxfordshire, Worcestershire and Warwickshire.

The town centre is characterised by a particularly wide high street lined with many elegant 17th and 18th century buildings built in the honey-coloured Cotswold stone and separated by green areas of grass and trees. The buildings now have a mix of uses including retail, hospitality, services and residential. Some examples include the White Hart Royal Hotel, a former manor house in which King Charles I sheltered during the Civil War and the rare Curfew Tower with its original clock and bell. In the centre is the Redesdale Hall, the town's main public hall, which regularly holds community events as well as antiques and craft fairs. This attractive centre is a vital asset when attracting tourists to the town. The community takes pride in the High Street as evidenced by the local High Street Gardeners who maintain the flower beds there.

The town sits in a very rural setting, with attractive scenery made up of woods and agricultural fields which are threaded with many public footpaths. A significant proportion of the Parish is within Cotswold National Landscape, for which the NPPF[6] notes: '*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection..'*

Employment is provided by the High Street businesses as well as two business parks, the Fire Service College and the medical facilities at the North Cotswold Hospital and Four Shires Medical Centre GP surgeries.
Education facilities are provided St David's C of E Primary School for children up to the age of 11, but senior school children must travel outside the town to places such as Chipping Campden and Bourton-on-the-Water.

Within the town there are facilities for a range of well-supported sports clubs including football, bowls and croquet and just outside the parish boundary (and therefore the plan area) adjacent to the Queen Victoria Gardens park and children's play area, there is a large sports field which has excellent facilities for the cricket and tennis clubs. In addition, there are a number of social clubs and societies within the town and children are catered for with several children's play parks around the town. The Fire Service College also provides residents with access to a variety of leisure facilities. There are a number of locations in the town where social activities are held including the iconic Redesdale Hall in the centre of the town.
Moreton-in-Marsh is generally considered to be well served by transport, but it can be difficult or impossible to travel to local villages and even some of the nearby towns using public transport.
It has a mainline railway station with direct links to London, Oxford and Reading one way and Malvern, Hereford and Worcester the other.
Moreton-in-Marsh is at the crossroads of the A429 (Fosse Way) running north/south and the A44 running east/west.

[6] NPPF 2024 Para 189

There are bus services to a number of local towns and villages including Cheltenham, Stratford-upon-Avon, Shipston-on-Stour, Bourton-on-the-Water and Stow on the Wold.

There is an extensive footpath network into and around the local countryside as well as a number of cycle paths. A recent example of the community commitment to local footpaths has been the planned establishment of the East Moreton Greenway.
While Moreton-in-Marsh is a working market town, tourism is also an important part of the economy. Nearby attractions include Batsford Arboretum, the Cotswold Falconry, Bourton House Garden and Sezincote Gardens, which for those visitors that enjoy walking, can be easily reached from Moreton by local footpaths including the Moreton Eight trail.

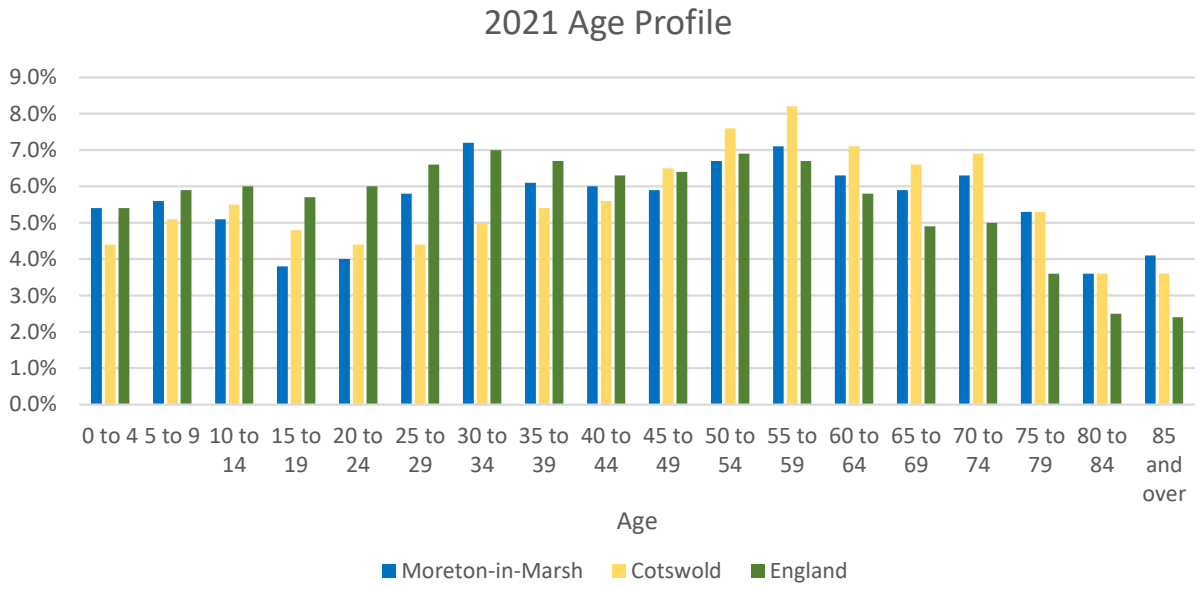
The town has a variety of accommodation, ranging from small self-catering cottages to luxury hotels, as well as a popular large caravan and campervan site only a short walk from the town centre.

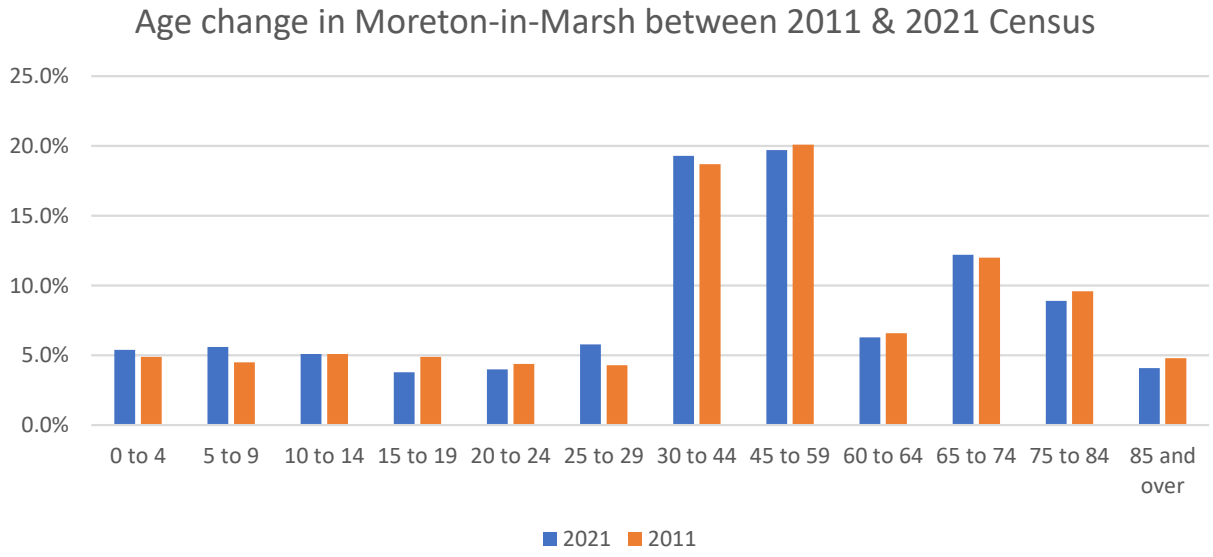
Every Tuesday throughout the year the High Street in Moreton-in-Marsh hosts the largest street market in the Cotswolds with many stalls selling a wide variety of goods including food (fresh and cooked), hardware, clothing, haberdashery, pet products, cookware, etc.

Each year, on the first Saturday in September, the Moreton Show, a major one-day agricultural show celebrating past and present farming life is held close to the town centre.
The neighbouring Batsford estate was originally owned by Lord Redesdale, father of the Mitford sisters. He erected the Redesdale Hall in the centre of the town and created the nearby Batsford Arboretum. Some of the estate is used by the Moreton tennis and cricket clubs and also for the annual Moreton Show. The estate is now owned by Lord Dulverton.

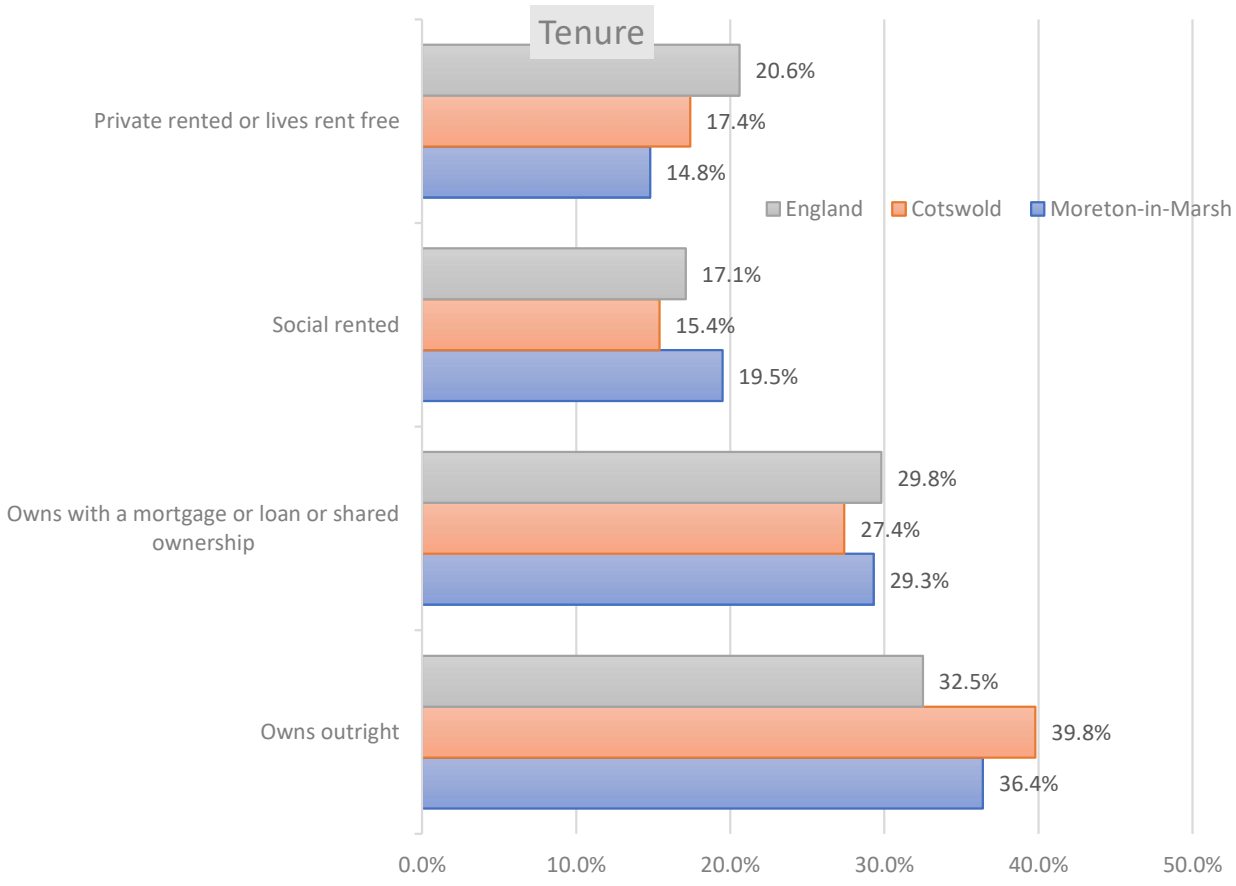
Profile of the Community Today[7]

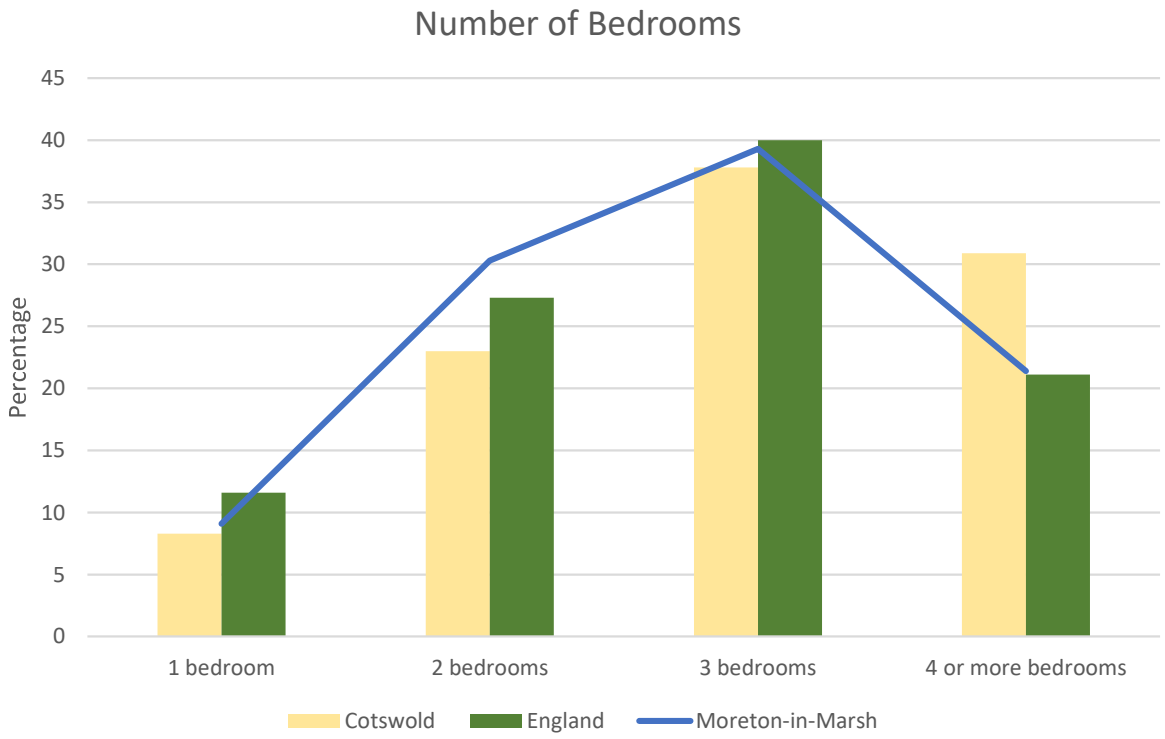
Key facts	Moreton-in-Marsh Parish	
	2011 ONS Census[8]	2021 ONS Census[9]
Area	609 hectares	609 hectares
Total population	3,493	5,015
Population density (no. of persons per hectare)	7.38	8.23
Households	1,799	2,400





[7] Information taken from 2021 Census
[8] ONS 2011 Census
[9] ONS 2021 Census


Tenure
Private rented or lives rent free
20.6%
17.4%
14.8%
England
Cotswold
Moreton-in-Marsh
Social rented
17.1%
15.4%
19.5%
Owns with a mortgage or loan or shared ownership
29.8%
27.4%
29.3%
Owns outright
32.5%
39.8%
36.4%
0.0%
10.0%
20.0%
30.0%
40.0%
50.0%


Number of Bedrooms
Percentage
45
40
35
30
25
20
15
10
5
0
1 bedroom
2 bedrooms
3 bedrooms
4 or more bedrooms
Cotswold
England
Moreton-in-Marsh

The Index of Multiple Deprivation (IMD) datasets are small area measures of relative deprivation across each of the constituent nations of the United Kingdom. Areas are ranked from the most deprived area (rank 1) to the least deprived area. Each nation measures deprivation in a slightly different way but the broad themes include income, employment, education, health, crime, barriers to housing and services, and the living environment. The most recent IMD calculations were taken in 2019.

The seven levels measured are:

Income: Measures the proportion of the population experiencing deprivation relating to low income

Employment: Measures the proportion of the working age population in an area involuntarily excluded from the labour market

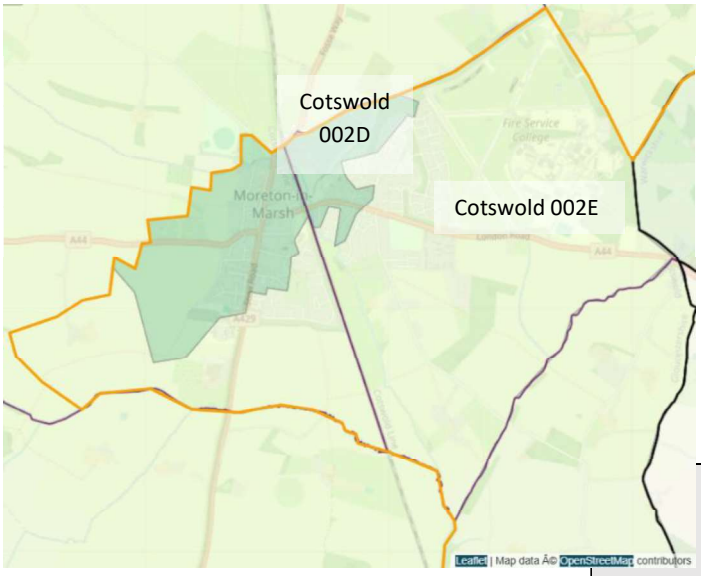
Education, Skills and Training: Measures the lack of attainment and skills in the local population

Health and Disability: Measures the risk of premature death and the impairment of quality of life through poor physical or mental health

Crime: Measures the risk of personal and material victimisation at local level

Barriers to Housing and Services: Measures the physical and financial accessibility of housing and local services

Living Environment: Measures the quality of both the 'indoor' and 'outdoor' local environment, e.g. indoor: proportion of houses with central heating; outdoor: air quality, road traffic accidents



For the purpose of IMD's Moreton-in-Marsh is split into two wards: Cotswold 002D and 002E. These 2 wards were ranked overall as 17,850 and 25,479 out of 32,844 areas in England, where 1 is the most deprived area. This is amongst the 60% and 80% least deprived neighbourhoods in the country.

When split out by level, the results are quite diverse:

Indices	Cotswold 002D Overall rank	Cotswold 002D Decile	Cotswold 002E Overall rank	Cotswold 002E Decile
Overall Rank	**17,850**	**6**	**25,479**	**8**
Income	15,464	5	23,922	8
Employment	12,147	4	22,263	7
Education	9,325	3	14,773	5
Health	19,115	6	26,926	9
Crime	27,059	9	28,758	9
Barrier to housing	24,420	8	11,805	4
Living Environment	23,070	8	30,103	10
Decile=1 most deprived, 10 least deprived				

Section Two
Policy Context

National And Regional Policy

- This section of the plan explores the topic areas to be covered in the Neighbourhood Plan in more detail. Each section identifies relevant policies and evidence at the national, regional, and local level, as well as a summary of Moreton-in-Marsh resident's views collated to date.
- Evidence is drawn from a series of sources including:
    - The National Planning Policy Framework[10] (NPPF) first published in March 2012 and revised in July 2018, updated February 2019, July 2021, December 2023 and December 2024.
    - The NPPF sets out the planning policies for England and how these are expected to be applied in order to achieve sustainable development.
    - The Local Plan for Cotswold District Council[11] formally adopted by the Council on 3rd August 2018. It sets out the current situation for the district, as well as some overarching strategic objectives for the future.
    - The Local Plan now forms part of the Development Plan for the District and will be used in the determination of all planning applications submitted to the Council alongside policies in the Affordable Housing Supplementary Planning Document (2007)[12]
    - Cotswold District Local Plan Sustainability Appraisal 2017[13]
- The purpose of the Sustainability Appraisal is to assess the environmental, social, and economic effects of approaches in order to help decide what the most appropriate policies will be.
- The Local Plan proposes 203 new homes over the period of the Local Plan (2011-2031) for Moreton-in-Marsh.
- In terms of employment land, MOR_E6 (Fire Services College B (7ha) has been allocated for B1 uses.
- Discussions with infrastructure providers have confirmed that the level of growth and development proposals are acceptable in principle. There are a number of infrastructure issues to be addressed. These include provision of a new primary school and investment in sewage treatment and sustainable urban drainage for surface water. An early review of primary health provision by the NHS may also be needed.
- Moreton has a good employment base (about 2,000 jobs), with a higher-than-average proportion of those jobs in growth employment sectors and a good balance of jobs to workers. The town's high sustainability ranking is despite the lack of both a secondary school and publicly available leisure facilities.

[10] National Planning Policy Framework December 2024

[11] *Cotswold District Local Plan (2011 – 2031)*

[12] *LDF Affordable Housing Supplementary Planning document (Adopted version 2007)*

[13] *Cotswold District Local Plan SA Report 12th January 2017*

Section Three
Vision and Objectives

Challenges for Moreton-in-Marsh:

The Neighbourhood Plan seeks to address, as far as possible the challenges that face the community of Moreton-in-Marsh. In summary these challenges are:

1. Heavy Goods Traffic and Congestion:
    - Address the traffic, parking and movement situation in the centre of the town to ensure it remains a thriving key service centre for the north Cotswold.
    - Recognising alternatives to the private car as a means of travel need to be provided for and their use encouraged, particularly in relation to cycling and walking.

2. Excessive Population Growth:
    - Ensuring strategic developments identified in the Cotswold Local Plan are integrated into the existing community of Moreton-in-Marsh so that they do not function as separate from the existing communities.

3. Loss of Green Space to Development:
    - Protecting the significant green spaces, views and biodiversity assets in the parish, increase habitat for wildlife and biodiversity and provide new accessible green space for the growing population.
    - Some of the walking / cycling routes in and around the town are in need of major improvements.

4. Flooding and Water Management:
    - Ensuring the growth in population arising from new development does not put an unacceptable strain on existing infrastructure, including (but not limited to) sewage and water infrastructure overload.

5. Economic Challenges:
    - Ensuring additional footfall generated from new economic activity uses Moreton-in-Marsh town centre.
    - Currently, residents “commute out” of Moreton-in-Marsh for employment meaning opportunities need to be sought to create more local employment in light of the new development which will take place.

Other challenges identified through community engagement:

- Anti-social behaviour and crime.

Vision for Moreton-in-Marsh

In 2043 Moreton-in-Marsh is an attractive, vibrant and prosperous market town with a wide range of housing options. Moreton benefits from excellent transport links, a network of safe walking and cycling routes. The town successfully blends its role as a key retail and service centre for businesses, residents and visitors in a green, bio-diverse, low carbon environment.

Objectives for Moreton-in-Marsh

Housing

1) New developments to be energy efficient and climate adaptive.
2) New developments to provide a range of housing to meet the needs of local people.
3) New developments on brownfield sites to take priority over greenfield sites.
4) To ensure new homes are of high-quality design and built to Building Research Establishment Environmental Assessment Method (BREEAM) standards.
5) Ensure appropriate infrastructure is in place to support new development prior to the completion of the project.
6) To support the provision of principal residence housing for those wishing to live in Moreton-in-Marsh.

Economy & Business

7) New developments to facilitate and support the growth of the business base within Moreton-in-Marsh, creating more jobs across a diverse range of sectors.
8) Support development of small business units/shared space.

Town Centre

9) New developments to support and sustain a vibrant attractive and successful town centre that meets the needs of the local community and visitors.
10) Improve the public realm and traffic management within and through the town to provide easier, safer and more pleasant access for residents and visitors, using developer contributions.

Environment

11) Protect and maintain open green spaces.
12) Protect and maintain archaeological and built heritage assets deemed to be of value to the community.
13) Preserve and increase opportunities for biodiversity net gain.
14) Preserve important views within the parish.
15) Protect the sensitive natural environment and exceptional rural assets surrounding Moreton-in-Marsh.

Transport & Active Travel

16) Create a more connected parish for residents and visitors alike, limiting the need for vehicular travel within the town and offering a genuine choice of transport options to help reduce congestion and emissions, to improve air quality and public health.

Community Aspirations

- As part of the consultation process for this plan, a number of issues were highlighted by the community as being necessary to maintain the competitiveness and governance of Moreton-in-Marsh in the future.

- It is recognised these are outside the scope of the Neighbourhood Plan; however, they have been mentioned many times by the community and inform some of the key objectives.
- Given that they clearly have such an importance, it is felt they should be documented for the community to see as well as to ensure these issues are highlighted to the relevant bodies. Therefore, as well as being mentioned in the relevant policies section, these actions are identified as Community Aspirations.
- Moreton-in-Marsh Town Council does not have the resource to follow through on all the community aspirations identified during the preparation of the Neighbourhood Plan. The Council has therefore agreed to create and support a Community Plan Steering Group, which would be a delegated Committee of the Town Council. The Group:
    - Should be largely composed of non-councillor residents.
    - Would develop a Community Plan, with professional support if required and within the budgetary constraints of Moreton-in-Marsh Town Council.
    - Would determine the priority of the aspiration, a reasonable timeframe for completion and the body responsible for taking any required action.
    - Would report regularly to Moreton-in-Marsh Town Council, which would be the responsible body for agreeing any public actions.

Section Four
Policies

Approach to Sustainable Development

Moreton-in-Marsh is designated in the Cotswold District Local Plan as the main service centre (Principal Settlement) for the North Cotswolds making it one of the area's most accessible settlements. The town's retail centre is also ranked fourth in the District, making it a key service centre in Cotswolds' retail hierarchy. As such, staged development within Moreton-in-Marsh will be supported, not least as this will help the settlement to continue to provide for the services and facilities required by a growing community.

Moreton-in-Marsh is considered to have one of the District's most accessible settlements with high employment and higher than average growth. However, there is no secondary school nor are there leisure facilities available to the public.

However, Moreton-in-Marsh benefits from the Cotswold Business Village and the Fire Services College and a railway station on the Oxford-Worcester line. Whilst this transport link is an advantage locally for commuting residents, it also leads to parking issues which are addressed through the Neighbourhood Plan.

The Local Plan cites these factors as contributing to the allocation of 203 houses over three sites in Moreton-in-Marsh.

It is also worth noting that Moreton-in-Marsh has been identified as at risk from flooding, a factor being addressed through the Neighbourhood Plan.

With the allocation of housing, it is crucial the infrastructure is in place to support this development in Moreton-in-Marsh, and this is identified in the Cotswold Local Plan. However, the Neighbourhood Plan addresses this issue to ensure locally identified issues are considered and needs met, especially in relation to the traffic and transport infrastructure.

In addition to the objectives set out above, the plan and its policies have also been developed with the following principles in mind. It is recommended that developers and applicants consider, where relevant, the following overarching principles of development when preparing and submitting planning applications within the neighbourhood area.

Early consultation with the Town Council and other community organisations is highly recommended, especially where the scheme is for more than a single dwelling or involves the use of a previously developed site. The town council wish to be informed about development in neighbouring areas outside the plan area, which may have an impact on residents in the neighbourhood area.

Where possible, applications which support the ongoing activities of social housing providers will be supported and encouraged, and applications should consider these opportunities at an early stage of preparing their planning application.

In considering the development or redevelopment of sites, applicants should be mindful to not overdevelop a site, in terms of delivering a scale or density of development which would be incongruous with its immediate neighbours and preserving local amenity.

Wherever possible, contributions for open space, highways and transportation and social housing should be spent locally, unless there are no viable options to do so locally.

Planning applications which accord with the policies in the plan will be approved unless material considerations indicate otherwise. Planning permission will also be granted where relevant policies in the neighbourhood development plan are out of date or silent unless:

- Other relevant policies in the development plans for Cotswold indicate otherwise
- Any adverse impacts of the proposal would significantly and demonstrably outweigh its benefits when assessed against the policies in the NPPF taken as a whole.
- Or specific policies in the framework or other material considerations indicate that development should be restricted.

Moreton-in-Marsh Town Council will take a positive approach to its consideration of development. The council and the local planning authorities will seek to work with applicants and other stakeholders to encourage the formulation of development proposals that can be approved.

The policies incorporate the key principles from the NPPF into the Plan. Where planning applications are to be considered against the policies of this plan then the policy will underpin the approach the council and local planning authorities will adopt in delivering sustainable development in the neighbourhood area.

Monitoring and Review

The Neighbourhood Plan has been prepared to guide development up to 2043. It is unlikely that the Neighbourhood Plan will remain current and completely relevant for the entire plan period and may, in whole or in part, require amendment before 2043.

This is particularly relevant as Cotswold District Council is in the process of updating its Local Plan.

The main question to be asked through the monitoring process is “Are planning applications being determined in accordance with Neighbourhood Plan policies?”

In all cases, the Town Council and its partners will undertake a partial review of the Neighbourhood Plan within five years of it being made.

Overview of Policies

- This section provides the planning policies which have been written, to explain how development in Moreton-in-Marsh should be approached, designed, and built, in order to support the objectives identified by the community set out in section Three.
- There are a total of twenty policies addressing five topic areas. These are:
    - housing
    - economy and business
    - town centre
    - the environment
    - transport and active travel
- Each of the five policy sections are introduced by an explanation to the background to that particular issue as it relates to Moreton-in-Marsh and by setting out the local context and circumstances in which the policy area has been approached. This includes the problems, issues, concerns, objectives, and aspirations of the local community.
- Each of the twenty individual policies then form two parts:
    - the policy itself, which provides the wording which should be understood and followed by developers when proposing new development, and by the local planning authority when considering proposals.
    - a reasoned justification to provide an understanding of the reasons behind the policy, the background of the particular issue that the policy seeks to address, more detail on the outcome(s) that the policy is intended to achieve, and how the policy is expected to be implemented.
- Not all of the policies will be relevant to every type of development, but anyone proposing development in Moreton-in-Marsh will be expected to ensure that they consider and address the policies that are relevant to their proposals, so that the plan is implemented successfully to achieve the local community's objectives.

Policies and Objectives Matrix

Objective ref	Objective	Policy Ref
1	New developments to be energy efficient and climate adaptive.	1,2,4
2	New developments to provide a range of housing to meet the needs of local people.	2,3,4
3	New developments on brownfield sites to take priority over greenfield sites.	6
4	To ensure new homes are of high-quality design and built to Building Research Establishment Environmental Assessment Method (BREEAM) standards.	4,5
5	Ensure appropriate infrastructure is in place to support new development prior to completion of the project.	2,8,9
6	To support the provision of principal residence housing for those wishing to live in Moreton-in-Marsh.	10
7	New developments to facilitate and support the growth of the business base within Moreton-in-Marsh, creating more jobs across a diverse range of sectors.	11
8	Support development of small business units/shared space.	12,13
9	New developments to support and sustain a vibrant attractive and successful town centre that meets the needs of the local community and visitors.	13,14
10	Improve the public realm and traffic management within and through the town to provide easier, safer and more pleasant access for residents and visitors, using developer contributions.	14
11	Protect and maintain existing public open green spaces.	15,16, 17
12	Protect and maintain archaeological and built heritage assets deemed to be of value to the community.	16
13	Preserve and increase opportunities for biodiversity net-gain.	17
14	Preserve important views within the parish.	18
15	Protect the sensitive natural environment and exceptional rural assets surrounding Moreton-in-Marsh.	19
16	Create a more connected parish for residents and visitors alike, limiting the need for vehicular travel within the town and offering a genuine choice of transport options to help reduce congestion and emissions, to improve air quality and public health.	20

Housing Policies

Housing Allocations in Cotswolds Local Plan

The current Cotswold District Plan 2011-2031 Policy S18 states that the following are allocated housing sites for this period:

Site	Dwellings Allocated	Dwellings Delivered (June 25)
• Land at Evenlode Road	63	67
• Land southeast of Fosseway Avenue	91 and 28	250 Under Construction
• Former hospital site	21	20

Note: The Cotswold District Local Plan Update Consultation[14] Moreton-in-Marsh is identified as a potential strategic growth area with a suggestion of 1,500 additional homes by 2041.

[14] Folder: Local Plan Update Consultation | Cotswold District Council

Policy One

Climate Adaption and Energy Efficiency in Developments

Objective One

New developments to be energy efficient and climate adaptive.

a) Proposals which enhance carbon capture and ecological biodiversity whilst reducing flood risk are welcomed.

b) The fitting of renewable energy systems to domestic property is supported where appropriate in terms of architecture and location.

c) Proposals for the development of new housing, extensions to dwellings or business premises, will be particularly supported where they are designed to generate as much of their energy as reasonably feasible from renewable sources.

d) Where relevant and appropriate, energy assessment showing how new developments minimises carbon footprint and energy requirements should be submitted as part of the planning application.

e) Provision of electric vehicle charging, to account for current and projected future need, should be incorporated in relevant planning applications whether domestic, commercial or industrial uses.

f) Developments which show innovation and imagination to achieve zero carbon will be welcomed.

The objective of Policy 1 is to ensure that any new development in the town helps to reduce the climate change causes and impacts. It does this by supporting new developments which are energy efficient, use renewable energy and mitigate the effects of climate change.

Reasoned justification for Policy One

1 Whilst the volume and location of new development is important, so also is the quality of new housing in terms of energy efficiency, building design, safety and local environment.

2 The NPPF stresses the importance of well-designed places, and we endorse its recommendations.

3 Cotswold District Council Local Plan also emphasises both that quality design must be accorded priority if places are to be shaped as sustainable, and socially, economically and environmentally responsive.

4 New development both residential (including conversions) and non-residential should demonstrate a commitment to sustainable design and construction. In relation to climate change, increasing energy efficiency through design, and prioritising the use of sustainable low or zero-carbon forms of renewable energy generation are all important objectives.

5 On 10th September 2019 CDC declared a climate emergency, focussing on net-zero carbon and achieving 100% clean energy use as soon as possible. This policy aims to build on this basis.

6 When asked 'What size/type of new housing would you support?', respondents to community engagement showed the strongest support (60%) for 'homes built to higher environmental standards'.

7 62% of respondents agreed or strongly agreed with the statement 'The town should aim to be self-sufficient in locally generated renewable energy, as far as possible.'.

8 Paragraph 161 of the NPPF says 'The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change..'. This policy aims to build on this.

Policy Two

Managing Flood Risk

Objective One

New developments to be energy efficient and to climate adaptive.

a) When proposals for development are being considered, all sources of flood risks must be considered at the appropriate stages and the sequential and exception tests used to divert development to areas with lower probability of flooding, in accordance with NPPF and PPG guidance.

b) Proposals for development on land identified by the Environment Agency as lying within either Flood Zone 2 or 3, or in Flood Zone 1 in the circumstances outlined in footnote 63 of paragraph 181 of the December 2024 NPPF (or subsequent NPPF iterations), will require a Flood Risk Assessment (FRA), using appropriate calculations based on the highest expected groundwater levels for the area (200 year maximum). Proposals will only be supported where it can be demonstrated in the FRA that:

1) they include appropriate site-specific measures to address effectively all the identified surface and ground water issues; and

2) any residual flood risk can be safely managed.

c) Where it is appropriate to do so new developments should incorporate Sustainable Drainage Systems (SuDS).

The objective of Policy 2 is to minimise both of these events by ensuring that the capacity and capability of the local water management infrastructure is able to support any new development. This includes reducing flood risk in the town and the discharge of sewage into the local water courses.

Reasoned justification for Policy Two

9 Moreton-in-Marsh is subject to flooding and in addition to river flooding, has experienced groundwater, surface water and sewage flooding. In the summer of 2007, the High Street was under water for days following heavy rain and flash flooding.

10 Due to the topography of the parish, flooding arising from surface water run-off is a major issue for parts of the parish.

11 The CDC flood defence update map[15] identifies 5 different locations within Moreton-in-Marsh as parish flood locations.

12 The decision notice[16] for the development of 250 homes at Dunstall Farm laid out 5 conditions relating to water and flooding issues, including limiting occupancy to just 50 dwellings until actions have been completed to reduce risk of foul water and sewage.

13 The world's climate is changing and will continue to change as a result of greenhouse gas emissions, even if global warming is limited to 1.5ºC above pre-industrial level. In England,

[15] Moreton-in-Marsh flood update location map

[16] CDC Planning Permission application ref 19/02245/FUL para's 25/26/27/28/35

hotter drier summers, milder wetter winters, rising sea levels and more extreme weather events are expected in future. Projected changes in climate are expected to have a large impact on the water environment as a result of changes in sea level, river flow, groundwater recharge and water temperatures. Flooding, caused by intense or prolonged rainfall, as well as by sea level rise and coastal storm surges, has become more likely in recent years and this trend is expected to continue. Many people will experience climate change through its effects on water, and especially through floods and droughts.

14 The draft CDC strategic flood risk assessment[17] para 5.4 identifies the area surrounding Moreton-in-Marsh as being in groundwater hazard classification levels 3 or 4 meaning there is a risk of groundwater flooding to surface and subsurface assets. There is the possibility of groundwater emerging at the surface locally or within this zone there is a risk of groundwater flooding to both surface and subsurface assets. Groundwater may emerge at significant rates and has the capacity to flow overland and/or pond within any topographic low spots (level 4). It also highlights that groundwater flood risk should be afforded equal standing in importance and consideration as fluvial and surface water flood risk.

15 A briefing by the European Environment Agency in 2024 identified levels of Perfluorooctane Sulonfate (PFOS) at 2,000 times higher[18] than environmental standards in water samples taken from a stream in Moreton-in-Marsh.

16 Thames Water do not expect to meet the government's targets for storm overflows in Moreton-in-Marsh until 2040-2050[19]

Policy Three

Housing Mix

Objective Two

New developments to provide a range of housing to meet the needs of local people.

a) Any proposals which result in a net gain in dwellings should demonstrate how the applicant has sought to meet local needs in line with the Moreton-in-Marsh Housing Needs Analysis (Appendix H).

b) Proposals should provide for a mix of housing sizes and the delivery of smaller dwellings.

c) All proposals for new housing development must demonstrate how the types of dwellings provided will help ensure a balanced mix of housing for Moreton-in-Marsh, particularly through the provision of:

1) dwellings for smaller households.
2) purpose-designed, accessible accommodation for older persons or those with mobility needs.
3) one or two-bedroom accommodation for those wishing to downsize whilst retaining reception space.
4) starter homes for those wishing to enter the housing market.
5) Land for self-build opportunities.

d) The precise housing mix of new development will be determined on a site-by-site basis, having regard to viability and other relevant factors.

[17] CDC Strategic flood risk assessment
[18] ENDS Report 14/11/2024
[19] Investment plans for storm discharge sites

The objective of Policy 3 is to ensure that Moreton-in-Marsh remains a sustainable settlement with a balanced provision of housing. It seeks to ensure that any new housing development in Moreton-in Marsh includes the kinds of homes and tenures which meet the expressed needs of the local community.

Reasoned justification for Policy Three

17 The purposes of Policy 3 are to ensure that new housing development in Moreton-in-Marsh includes the kind of homes which meet the expressed needs of the local community, including smaller homes suitable for older people wishing to downsize and young people seeking an affordable first home for themselves or their families.

18 The NPPF[20] says that the planning system should deliver a wide choice of high-quality homes and that it should provide for a mix of housing types based on current and future demographic trends, market trends and the needs of different groups in the community.

19 Policy 3 seeks to ensure that Moreton-in-Marsh remains a sustainable settlement with a balanced provision of housing for people who may experience difficulties in accessing suitable housing in the parish and older persons wishing to move to more suitable accommodation.

20 The demographic groups to which policy 3 applies include younger persons seeking their first home, young person's seeking a smaller family home and older persons seeking smaller more manageable accommodation.

21 When asked in the community engagement what size/type of housing would be supported, 58% of respondents recorded 'support' or 'strongly support' for small 2 bed houses.

22 60% of respondents also recorded 'support' or 'strongly support' for bungalows.

23 55% of respondents supported or strongly supported Government Starter Homes (20% discount on market value for under 40's).

24 Smaller homes need to provide large reception space to suit downsizers.

Policy Four

Affordable Housing

Objective Two

New developments to provide a range of housing to meet the needs of local people.

a) Development proposals which make provision for affordable homes should reflect local need[21] and contribute to the objective of creating a mixed and balanced community. All affordable homes should be:

- provided within the development, distributed throughout the development and fully integrated within the market housing,
- Tenure blind, i.e. built using the same materials and in the same style as any market housing on the site,
- such that residents of affordable homes have the same access to all communal facilities as the residents of market housing
- of a type, size and tenure that meets local needs including provision of homes for rent,

b) Affordable homes will be prioritised for households with a strong local connection with the parish of Moreton-in-Marsh, as defined in figure P4(a) below and any relevant planning policy guidance.

[20] *National Planning Policy Framework Para 61-77*

[21] Appendix H Moreton-in-Marsh Housing Needs Assessment

c) Proposals should be accompanied by a statement demonstrating how the development addresses local affordable housing needs as set out in the Cotswold Strategic Housing Market Assessment 2015 (or subsequent updates) or any local objectively assessed need.
d) Development proposals which safeguard a proportion of the affordable homes and maintain affordability of the homes in perpetuity will be supported.

Local Connection Criteria:

Note: This criterion is supplementary to CDC HomeSeeker Plus Common allocations policy or subsequent updates.

Current residency: Normal residence in the 'area' for at least one year immediately prior to exchange of contracts for the relevant dwelling.

Employment: in permanent employment in the 'area', consisting of 16 hours a week or more, for at least six months immediately prior to exchange of contracts for the relevant dwelling. Home workers must show that their main workplace is in the 'area' (in an actual place of work, not where the head/regional office is located).

Family connection: an immediate family member (parents, children, siblings) over the age of 18 has continuously lived in the 'area' for at least the last three years.

Special circumstances such as caring responsibilities: a requirement to move to the 'area' to give care or support to a family member (or receive care or support from a family member). If you do not meet the above criteria but have exceptional circumstances which you are able to evidence this will be considered on a case-by-case basis.

Figure P4(a) Local Connection Criteria

The objective of Policy Four is to ensure that people with strong local attachments either through family or work, are able to find suitable local accommodation so that they can live in the town.

Reasoned justification for Policy Four

25 Local Affordable Housing needs as defined in the Cotswold District Council SHMA[22], Further Update, Affordable Housing, identifies affordable housing needs for the District.

26 When applied to general affordable housing the following requirements should be used to assess local need:

- An individual/at least one adult member of a couple or family unit seeking an affordable dwelling who has either lived or worked (at least 16 hours per week, paid or unpaid) continuously in the Neighbourhood Plan Area for at least the last 12 months.
- An individual/at least one adult member of a couple or family unit seeking an affordable dwelling who has a family member (defined as grandparents, parents, siblings or children of the applicant) that currently lives in the Neighbourhood Plan Area and has done so continuously for the last five years or more.
- An individual/at least one adult member of a couple or family unit seeking an affordable dwelling who was demonstrably forced to move away from the Neighbourhood Plan Area due to a previous lack of affordable housing.

27 In addition, when applied to exception sites:

- An individual/at least one adult member of a couple or family unit seeking an affordable dwelling who has lived in the Parish continuously for at least the last six months.

[22] Cotswold District Council SHMA 2016

28 42% of respondents supported or strongly supported new affordable shared ownership housing.

29 92% of respondents to the Vision & Objective survey agreed or strongly agreed with the objective 'New developments to provide a range of housing to meet the needs of local people'.

Policy Five

Well Designed Housing and Places

Objective Two

New developments to provide a range of housing to meet the needs of local people

Objective Four

To ensure new homes are of high-quality design and built to Building Research Establishment Environmental Assessment Method (BREEAM) or equivalent, standards.

a) Proposals for new development should demonstrate high quality design, reflect local distinctiveness, and seek to incorporate local design features evident in buildings in the surrounding area.
b) Development, whether residential or commercial, that seeks to meet the highest possible standards of construction Code for Sustainable Homes and BREEAM (Building Research Establishment Environmental Assessment Method) standards or equivalent will be strongly supported.
c) Layouts must retain important trees and hedgerows. The planting of new trees and shrubs of similar species to those already evident in the immediate surroundings is required.
d) New developments are required to provide adequate on-site refuse and recycling storage while minimising its visual impact.
e) Wherever possible, developments should be screened from the road using earthworks, native species green hedging and/or trees for highway boundaries wherever possible and where these are in keeping with the existing streetscape.
f) Developments should demonstrate how they are designed to ANGSt (Accessible Natural Greenspace Standards).
g) Proposals which provide for adaptable spaces suitable for home working will be strongly supported.
h) If the development site is not within a reasonable walking distance (1/2 mile) of existing allotments, sufficient space should be identified to provide allotments for a minimum of 10% of the new dwellings unless credible evidence shows this not possible.
i) The provision of high-quality open space with the opportunity for recreation and physical activity, proportionate to the development, is expected to be included in any Design and Access statement related to new development.
j) New housing developments must be well connected both within the site and with the wider area. Developers must demonstrate how they have had regard to movement (vehicular, pedestrian and cycle) and conform to Policy 20 Transport & Active Travel.

Reasoned justification for Policy Five

30 The design of new residential properties and the space in which they sit is important. Developers will be expected to demonstrate in their applications that the design and layout of the proposed development is sympathetic to the character of its immediate surroundings. This is not only because such an approach should be expected of all residential developments in the twenty-first century but because Moreton-in-Marsh is a parish that has a rich heritage of quality residential development and wishes this tradition to be maintained. For this reason, the Moreton-in-Marsh Design Statement (Appendix A) has been produced to guide development.

31 There is already a rich variety of architectural styles in the Plan area and any new development should contribute to this variety while being sympathetic to the existing character of this part of the Cotswolds. The Cotswold Design Code[23] forms part of the Cotswold Local Plan and is a material consideration in planning decisions. It includes Design and Architectural Design Guidelines, Local Vernacular Design Guidelines and Design Guidelines. Relevant guidance published by the Cotswold National Landscape board, including the Landscape Strategy and Guidelines for Landscape Character Type 17[24] should also be taken into account.

32 In addition to these locally developed guidelines, we wish to ensure that developers pay due regard to current relevant national design guidance, codes, standards, toolkits, award schemes etc., meeting standards and wherever viable, exceeding them. These standards include Housing Design Awards[25], Homes and Communities Agency Affordable Houses Survey[26], Building in Context,[27] Building for a Healthy Life (previously Building for Life 12)[28] Manual for Streets[29], BRE Home Quality Mark and other relevant BREEAM schemes (ref Evidence list and Glossary)[30].

33 The three underlying principles of ANGSt are:

a. Improving access to green spaces.
b. Improving naturalness of green spaces.
c. Improving connectivity with green spaces. .... at the same time as delivering a wide range of environmental, social and economic benefits.[31]

[23] Cotswold District Local Plan Appendix D
[24] Cotswold AONB Landscape Strategy and Guidelines
[25] *Housing Design Awards*
[26] *Homes and Communities Agency Affordable Homes Survey*
[27] *Building in Context*
[28] *Building for a Healthy Life*
[29] *Manual for Streets*
[30] *BREEAM*
[31] *Natural England Green Infrastructure Standards for England Jan 2023 Appendix 2*

Policy Six

Parking in Residential Developments

Objective Four

To ensure new homes are of high-quality design and built to Building Research Establishment Environmental Assessment Method (BREEAM) or equivalent standards.

Objective Sixteen

Create a more connected parish for residents and visitors alike, limiting the need for vehicular travel within the town and offering a genuine choice of transport options to help reduce congestion and emissions, to improve air quality and public health.

a) New residential development within the Plan area will provide an adequate level of off-street parking for residents. The following minimum standards will apply:

- 1-bed dwelling: 1 off-road car parking space
- 2-bed dwelling: 2 off-road car parking spaces
- 3-bed dwelling: 2 off-road car parking spaces
- 4-bed dwelling: 3 off-road car parking spaces
- 5+ bed dwelling: 4 off-road car parking spaces.

Garages as off-street parking

b) The following minimum internal dimensions should apply:

- Single garage: 3.0 metres wide x 6.0 metres deep
- Double garage: 5.7 metres wide x 6.0 metres deep

c) Accessible roof storage space should be provided where feasibly possible, to encourage use of garage space for vehicle parking.

Visitor parking

d) New residential development within Moreton-in-Marsh will provide adequate designated additional parking for visitors, at a minimum of one space per two dwellings. This can either be off-street or on-street, subject to the wider guidance set out within this policy. Visitor parking should be marked as such.

e) Parking spaces will be required to be constructed of permeable surfaces to minimise surface water run-off.

f) During the planning process for developments in reasonable proximity to the town centre (easy walking distance of approximately fifteen minutes), the provision of public car parking must be explored as well as opportunities for "active travel".

The objective of policy six is to reduce on-street parking in residential areas to improve the visual appearance of the development, give more pleasure to people walking through the space and address safety issues due to restricted space on the carriageway or pavement.

Reasoned justification for Policy Six

34. CDC Local plan: "Tourism and local tourist accommodation has a positive impact on the vibrancy of the Centre. However, parking issues and congestion hinder the retail and tourism function of the town; adversely affects local residents; and hampers the town's ability to strengthen / maintain its position as the main service centre for the north Cotswolds. Proposals for new development will take account of the provision of parking facilities and congestion issues in the centre of the town". It also goes on to say in section 9.8.4 "The importance of parking as a key issue in town centres is recognised in Policy INF5: Parking Provision. Furthermore, the Local Planning Authority will, as part of the approach to retail and town centre development, put measures in place to:

Review town centre parking; Continue to improve and enhance public realm and streetscape; Deliver traffic management improvements; and Support and promote markets.

35. A recent planning application[32] for 67 homes compelled over 50 residents to object, many on the basis of issues this would cause with parking on the already-busy Evenload Road.

Policy Seven

Brownfield First

Objective three

New developments on brownfield sites to take priority over greenfield sites.

a) The reuse of formerly developed land (brownfield land) will be strongly supported.
b) Development on these sites and any other brownfield sites will be supported.

The objective of policy seven is to minimise the loss of green spaces, agricultural land and countryside by ensuring that previously developed sites are considered for new development first.

Reasoned justification for Policy Seven

36. Paragraph 125 (c) of the NPPF (2024) states that planning polices, and decisions should, "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;"
37. The sight of derelict sites is a disincentive to investors in a town and greenfield development draws life out of the town. Moreton-in-Marsh residents are keen to maintain and increase the vibrancy of the town centre and so are keen to explore all opportunities to rejuvenate any derelict areas.
38. Brownfield sites tend to be much better located than greenfield sites, closer to shops, education, healthcare and public transport.
39. Building on brownfield land presents opportunity to simultaneously remove local eyesores and breathe new life into urban areas in need of regeneration. It can bring homes, jobs and services closer together, reduce car dependence and enhance communities.

[32] 19/00086/OUT Land to East of Evenload Road

Policy Eight

Hard Infrastructure

Objective 5

Ensure appropriate infrastructure is in place to support new development prior to completion of the project.

a) New development should not compromise the ability of the local infrastructure to support the existing settlement, and the proposed development concerned.

b) Proposals for new development will be required to demonstrate how the infrastructure plans are adequate for the number of proposed dwellings. This is required in instances where new dwellings or new non-residential buildings are proposed for major development (i.e., 10 or more dwellings / at least 1,000m2 of floorspace):

- the relevant water supply, wastewater treatment to be considered in line with policy 2 of this plan and
- electricity distribution and transmission network providers to be consulted.
- traffic and transport assessments, identifying and quantifying the effects of the traffic generated by the scheme on its own, and in combination with other consented and allocated schemes, on the Moreton-in-Marsh Conservation Area and on other heritage assets in the Town Centre.

c) Where the potential for adverse effects has been identified, then the proposals must make provision for the necessary mitigation measures to avoid contributing to the adverse effects caused to those assets.

d) It is expected that this infrastructure will be in place no later than the completion of development.

e) Nationally Significant Infrastructure Projects (NSIPs) and Utility plans that impact on the Parish and its surrounding area that are approved or updated are to be disclosed as soon as possible to ensure that plans within the Parish boundary are suitably adapted.

The Hard Infrastructure is the physical systems that enable the town to operate successfully. It includes buildings, roads, paths, utilities and technical systems (networks and cabling) as well as the assets required to make them operational.

Reasoned justification for Policy Eight

40 New development will inevitably put a strain on existing infrastructure, and new proposals for development will need to demonstrate how this has been considered and how appropriate new infrastructure is included as part of the masterplan.

41 Moreton-in-Marsh already has infrastructure and services that are under strain, including education, transport and utilities provision. As a result of further housing development delivered as part of the Cotswold District Local Plan, additional healthcare facilities, community and sports facilities and infrastructure are likely to have to be provided to meet the resulting increase in population.

42 As a rule of thumb, approximately 5 (five) primary school pupils and 2.5 secondary school pupils are created on any 20-dwelling residential scheme which has a mix of dwelling sizes[33]. Equally, any 20-dwelling scheme will create a lot more new residents who will require access to the network of local footpaths and cycle routes.

43 Therefore, in respect of residential development, the construction of new dwellings on larger schemes of 30 or more dwellings must be phased to ensure adequate time is allowed for identified local services and infrastructure to be expanded, in order to limit any sudden adverse impact of an increased population on the community and surrounding parishes.

44 The A429 and A44 both run through the centre of Moreton-in-Marsh.

45 When asked through the community engagement to rank their greatest concerns about living in Moreton-in-Marsh, respondents ranked 'Heavy Goods traffic and congestion' their top concern out of 15 options.

Policy Nine

Soft Infrastructure

Objective 5

Ensure appropriate infrastructure is in place to support new development prior to completion of the project.

a) New development should not compromise the ability of the local infrastructure to support the existing settlement and the proposed development concerned.

b) New housing will only be permitted where it can be demonstrated that there is the necessary capacity in the community and physical infrastructure and services are available to support the increase in population.

c) Proposals for development of 30 or more dwellings or planned large multi-phased development must ensure infrastructure and services are sufficient to address the impacts arising from the growth in population, and in place prior to completion of the development.

Soft infrastructure includes all the services which are required to maintain the economic, health, cultural and social standards of a population. It is essential in bringing a community together and enables it to enjoy a good quality of life. Examples include employment (work hubs, working from home, tourism, and retail), health (GPs, dentists, security, clean air, quiet places), leisure (green spaces, allotments, sports facilities, community facilities and social clubs), education (primary and secondary school access).

Reasoned justification for Policy Nine

46. Moreton-in-Marsh already has infrastructure and services that are under strain, including education, transport and utilities provision. As a result of further housing development delivered as part of the Cotswold District Local Plan, additional healthcare facilities, community and sports facilities and infrastructure are likely to have to be provided to meet the resulting increase in population.

47. As a rough rule of thumb, approximately 5 (five) primary school pupils are created on any 20-dwelling residential scheme which has a mix of dwelling sizes. Equally, any 20-dwelling scheme will create a lot more new residents who will require access to the network of local footpaths and cycle routes.

[33] Homes England Fact Sheet 5: New homes and school places

48. Therefore, in respect of residential development, the construction of new dwellings on larger schemes of 30 or more dwellings must be phased to ensure adequate time is allowed for identified local services and infrastructure to be expanded, in order to limit any sudden adverse impact of an increased population on the community and surrounding parishes.

Policy Ten

Principal Residence Housing

Objective 2

New developments to provide a range of housing to meet the needs of local people

Objective 6

To support the provision of principal residence housing for those wishing to live in Moreton-in-Marsh

a) Due to the impact on the local housing market due to the growth of dwellings used for holiday accommodation and second homes, new open market housing will only be supported where there is a restriction to ensure its occupancy as a principal residence.

b) This occupancy restriction will be guaranteed through the imposition of a planning condition or legal agreement.

c) A principal residence is defined as one occupied as the resident's sole, or main residence where they spend the majority of their time when not working away from home.

d) This obligation on new market homes will require that they are occupied only as the primary residence of those persons entitled to occupy them. Proof of entitlement will be verifiable via evidence such as inclusion on the electoral register or registration for local services.

The objective of policy 10 is to maintain the vibrancy of the local community and its economy.
Second homes and holiday homes are killing many communities around the country, and it is already an increasing problem in the Cotswolds. The homes remain empty for much of the time, so do not contribute to the local economy or the local community. They reduce the available housing stock for local people and push up prices so that they are unaffordable for many local people.
Whilst Moreton-in-Marsh might suffer this problem less than some of the more popular tourist destinations, it is a problem for the town.

Reasoned justification for Policy Ten

49. An analysis by 'Action on Empty Homes'[34] show that in 2024 3,409 homes in the Cotswolds were not in residential use on a long-term basis or were second homes, up from 2,639 in 2023 and 2,312 in 2022. This equates to one in seventeen homes were out of long-term use. This makes the Cotswolds the 14th highest out of 774 local authorities with second homes.

50. On 7th March 2024, Cotswold District Council agreed[35] to levy the maximum level of premium for Empty Homes as set out in the Levelling Up and Regeneration Act 2023. The report to the Council[36] noted: "The intention of the premium is to return second homes to the local housing market thereby increasing the level of available stock for permanent residents.".

[34] Long-term empty homes by local council areas
[35] CDC Decision details
[36] Council Tax Premium-second homes and long-term empty properties

Policy Eleven

Employment land

Objective Seven

New developments to facilitate and support the growth of the business base within Moreton-in-Marsh, creating more jobs across a diverse range of sectors.

a) There will be a general presumption against the loss of locations that provide employment within the Parish, either as a result of proposals for a change of use or for the redevelopment of existing premises or sites of employment for non-employment use.

b) Proposals for change of use or redevelopment, which would result in the loss of employment use, will only be acceptable if they demonstrate the following:

1. The premises or site is no longer required for employment use in terms of need or demand, by the premises or site having been marketed for a period of not less than one year for employment use and no occupier has been found. Full details relating to the marketing must accompany any proposal,
2. That the alternative use proposed will be a positive contribution to the sustainability of Moreton-in-Marsh.

c) Proposals put forward which increase the availability of employment land will be strongly supported.

d) Schemes which include proposals for the inclusion of environmentally friendly measures will be strongly supported. This may include (but not restricted to) the following measures:

1. Solar energy
2. Harvesting rainwater for use
3. Pollution and waste reduction
4. Lower carbon emissions
5. High standards of insulation

e) Where surplus energy is produced through self-generation, a scheme for reuse of this energy locally will be supported.

Prosperity is key to the success of any settlement. So, it is vital that any increase in population in the town should be accompanied by a proportionate increase in employment opportunities. In fact, historically, the population follows the jobs rather than the other way round. It is also important that jobs are provided locally, so that people can work locally and don't have to commute each day. This helps to reduce carbon emissions but also binds the community together socially.

Reasoned justification for Policy Eleven

51. The CDC Local Plan identifies Moreton-in-Marsh towns retail centre as fourth in the district, '..a 'key centre' role in the District's retail hierarchy, functioning as an important service centre and providing for an extensive rural catchment area..'
52. The Fire Service College is identified as an area for increase in employment opportunity and Cotswold Business Village is currently one of the main employment areas in the Cotswold district.

53. Paragraph 7.21.1 of the CDC Local Plan[37] states that Moreton-in-Marsh is '..widely regarded as the main service centre for the north Cotswolds..' and '..one of the District's most accessible settlements..'.
54. Paragraph 7.21.4 goes on to say '..the town is considered to have potential for its employment role to increase.'
55. National Planning Policy (NPPF para 90) states "Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation."
56. The community acknowledges the importance of bringing derelict buildings and commercial brownfield sites back into economic use however, a number of vacant or derelict land and buildings undermine the high quality of some areas of the parish. This is especially true within the historic core, where the quality of the shopping street and the gateway is undermined by closed shops and units. Bringing these back into use is a key aspiration of the plan.
57. Community engagement showed 57% of respondents would support the Neighbourhood Plan identifying further land for employment use. 65% would support the NP identifying buildings for employment use within the town centre.

Policy Twelve

Small Business Units

Objective Eight

Support development of small business units/shared space.

a) Proposals which provide for work hubs to accommodate small business units will be strongly supported.
b) Development proposals will be supported that will enable the expansion and retention of small, local businesses. Support will also be given to development proposals for the establishment of new businesses that diversify and strengthen the local economy without significantly adversely affecting the distinctive character of the community or creating significant additional traffic.
c) Applications will be particularly encouraged if they offer employment opportunities to local people. In particular, strong support will be given to development proposals that provide space for small start-up businesses.

The aim of this policy is to support the growth of microbusiness (fewer than 10 full time employees) and small businesses (fewer than 50 full time employees).

Reasoned justification for Policy Twelve

58. The improvement to local employment opportunities will not only provide employment, in particular the chance for local people to access jobs but will ensure that these are sustainable in terms of the patterns of commuting that they generate.
59. Nationally there has been strong growth in self-employment and it is considered that, to grow medium and larger-sized businesses in and around Moreton-in-Marsh, it is necessary to nurture business start-ups.
60. The Bank of England reported[38] that the number of new business registrations increased from 50,000 a month to 60,000 a month after March 2020 and solo entrepreneurs rose from 60% to

[37] Cotswolds District Local Plan 2011-2031
[38] Business creation during Covid-19

65% of the total (in other words, the uplift is almost entirely down to an increased number of solo entrepreneurs).

61. Not all these businesses will require employment space, as many people will work from home. However, for small start-up businesses, the ability to access workspace on flexible, 'easy-in, easy-out' terms help to provide the foundation to grow a business.
62. It is therefore important to ensure that employment land is used to meet local needs for a provision of a range of types and sizes of businesses to promote the vitality and viability of the town, including start-ups and micro businesses (a business of less than 10 employees).
63. This will also encourage younger people of working age to remain in the area rather than seeking work in the surrounding area or further afield.

Community Aspiration 1
Local Business Hub

Create a local business network whereby local businesses can have a voice which is heard, understood and acted on.

Town Centre Policies

Policy Thirteen

Retail Provision

Objective Eight
Support development of small business units/shared space

Objective Nine
New developments to support and sustain a vibrant attractive and successful town centre that meets the needs of the local community and visitors

a) Within the Core Retail Area (as defined by the NPSG) identified in Fig P13, the loss of Class E uses as a result of proposals for change of use or for redevelopment for non-retail use (C3), where prior approval is not given, will generally not be supported.
b) Proposals for change of use or redevelopment which would result in the loss of Class E retail use will only be acceptable if they demonstrate the following:
1. The premises or site is shown to be no longer required for retail use in terms of need or demand, by the premises or site having been marketed for a period of not less than one year for retail use and no occupier having been found. Full details relating to the marketing must accompany any proposal.
2. That the alternative use proposed will be deliverable and make a positive contribution to the sustainability, vitality and viability of Moreton-in-Marsh.

The objective of policy thirteen is to enable the town centre to continue to be an attractive and prosperous centre that serves not only Moreton residents but also those in surrounding villages as well as tourists.

Moreton-in-Marsh's town centre is vitally important to the feeling of place that it provides and also to the town's prosperity and vitality.

- It is regarded as a service centre to the surrounding area providing a range of shopping, social and leisure activities, hospitality, healthcare and education services.
- The retail centre ranks fourth in the District.
- It is a conservation area which is unique centre due to its broad high street, its greens, its lines of trees and its historic buildings.
- It provides much of the employment within the town and is an attraction for tourists.

However, Moreton is at the crossroads of the A429 (Fosse Way) and the A44 so is plagued at times with HGV's and traffic congestion which generate air and noise pollution which detract from the pleasure of pedestrians. The A429 in particular, also divides the High Street as it can be difficult to cross.

There is potential to manage the traffic better and provide more space on the High Street for pedestrians so that the quality of life can be improved along with the economy generated on the High Street from the local community and visitors alike.

Reasoned justification for Policy Thirteen

64. An article by the Local Government Association[39] highlights the permanent changes on the high street since the pandemic *'Patterns of work and commuting have, and will remain, changed – with implications for the future of high streets. The pandemic will prompt a permanent shift in the home location decisions of many families, and domestic tourism and staycationing will remain above pre-pandemic levels. The pandemic has reinvigorated interest in community and*

[39] Creating resilient and revitalised high streets in the 'new normal'

what's local, while technology has proven capable of replacing in person and physical connections in many aspects of daily life.' Moreton-in-Marsh needs to adapt new experiential offers and new technology to entice visitors and increase footfall. The report continues *'Many residents in villages, green belt and peripheral settlements with office-based jobs are continuing with hybrid working in the near-term, and high streets in these locations will need to meet the demands of former commuters. With fewer commuters leaving home during the day, high streets in feeder towns and suburban centres stand to benefit from increased footfall and a new higher spending weekday demographic.'*

65. Every effort should be made to retain the retail area of Moreton-in-Marsh as a welcoming and enticing destination.
66. The improvement to local employment opportunities will not only provide employment, in particular the chance for local people to access jobs but will ensure that these are sustainable in terms of the patterns of commuting that they generate.
67. All new built development should be of a scale and design which harmonises with the character and role of the centre and with the scale and architectural composition of any adjacent buildings. Details of materials and any landscaping proposals will also be considered when considering applications.
68. The vitality of the retail area within the town centre is largely dependent on primary retail frontages and so it is important that the retail frontages be retained and enhanced, and the majority of the businesses located in the primary area are retail outlets.
69. 32% of respondents to the community engagement said they would support the provision of new shops and retail through the NP. 20% agreed there was a need for more retail jobs.
70. When asked 'Should the use of town centre premises be protected? 38% agreed 'yes, protected' and 49% agreed 'Yes, some protection but recognise things change and we need to let this happen'.

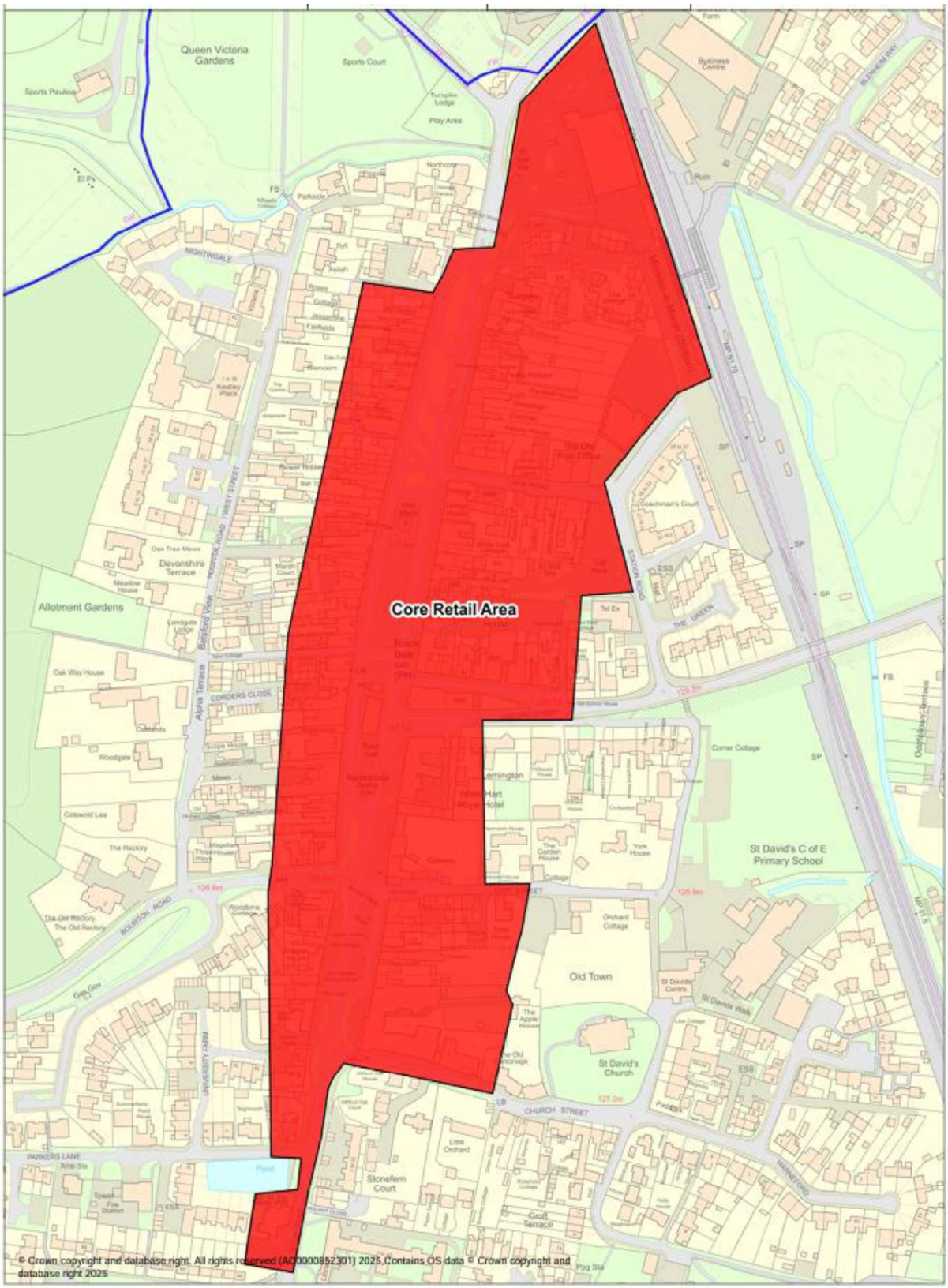


Fig P13 Moreton-in-Marsh Core Retail Area

Policy Fourteen

Infrastructure Investment Priorities

Objective Nine

New developments to support and sustain a vibrant, attractive and successful town centre that meets the needs of the local community and visitors.

Objective Ten

Improve the public realm and traffic management within and through the town to provide easier, safer and more pleasant access for residents and visitors, using developer contributions.

Subject to viability and to compliance with CIL regulations, all housing developments of 10 or more homes will be expected to contribute to the following local priorities:

a. Refurbishment, including Public Realm improvements, around the Redesdale Hall

b. Moreton-in-Marsh High Street Refurbishment improvements

c. Remove long-stay parking from the town to a location close to the train and bus stations

d. Improve Accessibility around Moreton-in-Marsh

e. Invest in planting around the town such as a community orchard, additional woodland or a herb garden

f. Additional retail on the East side of Moreton-in-Marsh

More detailed information can be found in Appendix B

Reasoned justification for Policy Fourteen

71. It was agreed that the list of priority projects should be taken directly from the responses we have received from the community.

72. The provision of supporting infrastructure is vital in achieving sustainable growth. Infrastructure covers a very broad range of considerations. At its most basic, it is utilities and communications infrastructure: water, sewerage, drainage, gas, electricity, mobile phone, conventional phones and broadband. However, infrastructure also comprises community infrastructure matters, such as health, education, play areas, green open spaces, leisure facilities and so on. This section addresses these issues as well.

73. As a clear expression of the community's wishes, Moreton-in-Marsh Town Council intends that the CIL agreements and contributions raised within the Moreton-in-Marsh Neighbourhood Area and, where relevant, monies from other planning obligations, are used to contribute towards delivering any of the projects listed above, providing they demonstrate compliance with the Community Infrastructure Regulations.

74. Developer contributions from development can be used to contribute towards addressing these issues.

Community Aspiration 2
Overnight parking in town centre

Introduce residential parking permits to prevent overnight parking in the town centre

Policy Fifteen

Local Green Spaces

Objective Eleven

Protect and maintain open green spaces.

The following areas, as shown on the proposal's maps in Appendix C, are designated as Local Green Spaces:

1	Moreton Rangers FC
2	Outdoor gym, skate park & practise football pitch
3 (a)	Blenheim Meadow
3 (b)	Cotswold Gate open space
3 (c)	Moreton Park / Cotswold Gate
4	Land east of Moreton Park
5	Entrance to Fire Service College
6	Upper Cemetery
7	Lower Cemetery
8	University allotments
9	Hospital Road allotments
10	Croft Road allotments
11	St David's churchyard
12	Tinkers Close playground
13(a)	Redesdale Place MUGA
13 (b)	Redesdale Place Croquet club
13 (c)	Redesdale Place Bowls club
14	Monarch Way Grassed strip
15 (a)	Jubilee Gardens
15 (b)	Jubilee Gardens opposite verge
16 (a) - (f)	Greens on High St
17	Queen Victoria Gardens
18	Mann Institute Gardens
19	Glebe Field
20	Special habitat – Stockwells
21(a)	Moreton Park - 1
21(b)	Moreton Park – 2
21(c)	Moreton Park - 3

a. Proposals for development on these Local Green Spaces will not be permitted unless it can be clearly demonstrated with compelling evidence that it is required to enhance the role and function of an identified Local Green Space.

b. Where permission for development can be demonstrated to be required with compelling evidence, developers will be expected to demonstrate how the existing flora and fauna will be protected or be subject to mitigation measures.

c. Where loss of Green Space is considered essential, mitigation measures will be required to provide equivalent facilities.

Reasoned justification for Policy Fifteen

75. Under the NPPF, neighbourhood plans have the opportunity to designate Local Green Spaces which are of particular importance to the local community. This will afford protection from

development other than in very special circumstances. Paragraph 107 of the NPPF says that Local Green Space designation should only be used where the green space is:

- in reasonably close proximity to the community it serves;
- demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- local in character and is not an extensive tract of land.

76. Proposals maps in Appendix C show the areas that are considered to meet these criteria and must be protected as Local Green Spaces.

1: Moreton Rangers FC	
"In reasonably close proximity to the community it serves"	Marked area 1 on green spaces map and in a populated south east part of the town close to the business village and housing
"demonstrably special to the local community"	It is a sports field which regularly holds training and matches for various teams of all ages
"local in character and is not an extensive tract of land"	Within walking distance of the centre of town The whole area covers approx. 1.09ha

2: Outdoor Gym, Skate Park and practise football pitch	
"In reasonably close proximity to the community it serves"	Marked area 2 on green spaces map and in a populated south east part of the town close between the business village and housing
"demonstrably special to the local community"	Public amenity space providing valuable space for leisure and play activities.
"local in character and is not an extensive tract of land"	Within walking distance of the centre of town The whole area covers approx. 0.70ha

3 (a): Blenheim Meadow	
"In reasonably close proximity to the community it serves"	Marked area 3(a) on green spaces map and in a populated north east part of the town bounded by housing, railway and road
"demonstrably special to the local community"	Open public space, adjoining Cotswold Gate including the River Evenlode and mature trees which attract wildlife and nature, providing a safe walking route joining parts of the town.
"local in character and is not an extensive tract of land"	Open space with a feel of the local countryside The whole area covers approx. 4ha

3 (b): Cotswold Gate Open Space	
"In reasonably close proximity to the community it serves"	Marked area 3(b) on green spaces map and in a populated north east part of the town flanked by housing
"demonstrably special to the local community"	Open public space, adjoining Blenheim Meadow including an attenuation pond which attracts wildlife and nature, particularly well-used during covid
"local in character and is not an extensive tract of land"	Open space with a feel of the local countryside The whole area covers approx. 5ha

3 (c): Moreton Park/Cotswold Gate	
"In reasonably close proximity to the community it serves"	Marked area 3(c) on green spaces map and situated in a residential area regarded as a nature reserve. Linking footpaths to parts of the Town including the railway station
"demonstrably special to the local community"	Continuance of Blenheim Meadow as an open meadow space promoting wellbeing
"local in character and is not an extensive tract of land"	Remaining meadowland predating residential development. The whole area covers approx. 3.51ha

4: Land east of Moreton Park	
"In reasonably close proximity to the community it serves"	Marked area 4 on green spaces map and on the north east edge of the housing in Moreton
"demonstrably special to the local community"	Provides a green buffer between local housing and an active fire training facility and provides a safe walking route to the business village. A nature reserve which supports endangered newts.
"local in character and is not an extensive tract of land"	Grass, ponds and marsh land. The whole area covers approx. 5.4ha

5: Entrance to Fire Service College	
"In reasonably close proximity to the community it serves"	Marked area 5 on green spaces map and situated to the eastern entrance to the town.
"demonstrably special to the local community"	A wide cut-grass verge and tree-lined avenue which provides a gentle, visual transition between the countryside and the town and provides screening at the entrance to the active fire training college.
"local in character and is not an extensive tract of land"	Site of a war memorial to the Wellington Bomber crews who trained here in WWII The whole area covers approx. 1.1ha

6: Upper Cemetery	
"In reasonably close proximity to the community it serves"	Marked area 6 on green spaces map and situated in the east of the town bordering the business village and the football ground
"demonstrably special to the local community"	A well-maintained community asset with yew tree-lined pathways and Bier House.
"local in character and is not an extensive tract of land"	Includes Commonwealth War graves and memorial The whole area covers approx. 0.88ha

7: Lower Cemetery	
"In reasonably close proximity to the community it serves"	Marked area 7 on green spaces map and situated in the east of the town surrounded by housing.
"demonstrably special to the local community"	A 19th century community asset with specimen trees, bat house and Bier House and of historical interest
"local in character and is not an extensive tract of land"	Traditional Victorian style cemetery The whole area covers approx. 0.58ha

8: University Allotments	
"In reasonably close proximity to the community it serves"	Marked area 8 on green spaces map and situated in the centre of Moreton Old Town
"demonstrably special to the local community"	An important community asset, gifted by the Bowes-Lyons family to the University of Oxford supporting the health and well-being of residents
"local in character and is not an extensive tract of land"	Easily accessible to local residents. The whole area covers approx. 2.41ha

9: Hospital Road Allotments	
"In reasonably close proximity to the community it serves"	Marked area 9 on green spaces map and close to the countryside, yet very close to the High Street.
"demonstrably special to the local community"	An important community asset, with views of the Cotswold Edge and Cotswold National Landscape and supporting the health and well-being of residents
"local in character and is not an extensive tract of land"	Easily accessible to local residents. The whole area covers approx. 0.24ha

10: Croft Road Allotments	
"In reasonably close proximity to the community it serves"	Marked area 10 on green spaces map and close to the countryside and to housing in the Back House, Wellington Gardens and Cornish House developments
"demonstrably special to the local community"	Situated in the Special Landscape Area, it is an important community asset, with view of St David's church and Batsford House and supporting the health and well-being of residents and encouraging biodiversity
"local in character and is not an extensive tract of land"	Easily accessible to local residents. The whole area covers approx. 1.58ha

11: St David's Churchyard	
"In reasonably close proximity to the community it serves"	Marked area 11 on green spaces map, In the centre of town between Moreton Old Town and the High Street
"demonstrably special to the local community"	Traditional Cotswold church with bells providing a valuable service to the community, supporting their health and well-being.
"local in character and is not an extensive tract of land"	Easily accessible to local residents, providing a focal point for the town The whole area covers approx. 0.41ha

12: Tinkers Close Playground	
"In reasonably close proximity to the community it serves"	Marked area 12 on green spaces map, housing on three sides and University Allotment on the 4th. Cut through to the Primary school.
"demonstrably special to the local community"	Popular walk through and recreational space (play area plus football play space) for surrounding housing
"local in character and is not an extensive tract of land"	Open green space for wellbeing The whole area covers approx. 0.16ha

13 (a): Redesdale Place MUGA	
"In reasonably close proximity to the community it serves"	Marked area 13(a) on green spaces map and borders on Redesdale Place housing and accommodates the Multi Use Games Area.
"demonstrably special to the local community"	Provides an area for all age activities facilitating recreation and wellbeing options.
"local in character and is not an extensive tract of land"	Adjacent to the National Footpath (Monarchs Way and Moreton Eight Walk) The whole area covers approx. 0.89ha

13 (b): Redesdale Place Croquet Club	
"In reasonably close proximity to the community it serves"	Marked area 13(b) on green spaces map and borders on Redesdale Place housing and accommodates the Croquet Club.
"demonstrably special to the local community"	Provides an area for all age activities facilitating recreation and wellbeing options.
"local in character and is not an extensive tract of land"	Adjacent to the National Footpath (Monarchs Way) and Moreton Eight Walk The whole area covers approx. 0.40ha

13 (c): Redesdale Place Bowls Club	
"In reasonably close proximity to the community it serves"	Marked area 13(c) on green spaces map and borders on Redesdale Place housing and accommodates the Bowls Club.
"demonstrably special to the local community"	Provides an area for all age activities facilitating recreation and wellbeing options.
"local in character and is not an extensive tract of land"	Adjacent to the National Footpath (Monarchs Way and Moreton Eight Walk) The whole area covers approx. 0.30ha

14: Monarchs Way grassed strip	
"In reasonably close proximity to the community it serves"	Marked area 14 on green spaces map, open fields and hedgerow on one side and housing to the other.
"demonstrably special to the local community"	Limited vehicle access part way leading to grassed walkway. The grassed walkway is much used by pedestrians seeking a tranquil walk around the outskirts of the Town with views to the Cotswold National Landscape.
"local in character and is not an extensive tract of land"	A green buffer providing a wildlife habitat on the edge of the Town. The whole area covers approx. 0.23ha

15 (a/b): Jubilee Gardens & Jubilee Gardens opposite verge	
"In reasonably close proximity to the community it serves"	Marked area 15 (a) & 15 (b) on green spaces map, to the West of the Town planted to commemorate the Festival of Britain situated inside the conservation area.
"demonstrably special to the local community"	Wildlife habitat shielding residents from the noise of traffic on the A44
"local in character and is not an extensive tract of land"	Cotswold Stone Wall surround and carved Festival of Britain Logo on the gate posts. The whole area covers approx. 0.28ha

16 (a-f): Greens on High Street	
"In reasonably close proximity to the community it serves"	Marked area 16 (a-f) on green spaces map and situated on a Conservation High Street
"demonstrably special to the local community"	Designated Village Greens.
"local in character and is not an extensive tract of land"	The avenue of trees and the grassed areas (known as the greens) are an integral part of the character and charm of Moreton-in-Marsh's broad High Street.The whole area covers approx. 0.17ha

17: Queen Victoria Gardens	
"In reasonably close proximity to the community it serves"	Marked area 17 on green spaces map and at the north end of the conservation High Street
"demonstrably special to the local community"	Supports a large, fenced play area plus a recreational space and lime walkway
"local in character and is not an extensive tract of land"	The lime walkway is reminiscent of the tree lined High Street. The whole area covers approx. 2.86ha

18: Mann Institute Gardens	
"In reasonably close proximity to the community it serves"	Marked area 18 on green spaces map and situated in the conservation area
"demonstrably special to the local community"	The gardens provide a peaceful space in the midst of the centre of the Town surrounded by wrought iron railings.
"local in character and is not an extensive tract of land"	Part of the historic curtilage of the adjacent Mann Institute The whole area covers approx. 0.02ha

19: Glebe Field	
"In reasonably close proximity to the community it serves"	Marked area 19 on green spaces map and is within the town
"demonstrably special to the local community"	Historic connection to the Parish. An important separation between the Campsite and Town. With views to the High Wold and Cotswold escarpment.
"local in character and is not an extensive tract of land"	Typical of parkland where stock can graze under the ancient oaks. The whole area covers approx. 2.13ha

20: Special Habitat-Stockwells	
"In reasonably close proximity to the community it serves"	Marked area 20 on green spaces map and formally recognised as a special habitat area rich in biodiversity
"demonstrably special to the local community"	Wildlife habitat encouraging numerous species.
"local in character and is not an extensive tract of land"	The site is within the built-up area of the town, a remaining undeveloped/undisturbed piece of land The whole area covers approx. 0.25ha

21 (a): Moreton Park 1	
"In reasonably close proximity to the community it serves"	Marked area 21 (a) on green spaces map, close to residential area with footpath and woodland habitat separating residential area from the A44.
"demonstrably special to the local community"	Woodland habitat encouraging walking with nature, promoting wellbeing.
"local in character and is not an extensive tract of land"	Large trees predating residential development The whole area covers approx. 1.81ha

21 (b): Moreton Park 2	
"In reasonably close proximity to the community it serves"	Marked area 21 (b) on green spaces map and situated within residential area
"demonstrably special to the local community"	Wooded spaces with walkthrough to promote wellbeing
"local in character and is not an extensive tract of land"	Large trees predating residential development The whole area covers approx. 1.63ha

21 (c): Moreton Park 3	
"In reasonably close proximity to the community it serves"	Marked area 21(c) on green spaces map and situated within residential area
"demonstrably special to the local community"	Wooded spaces with walkthrough to promote wellbeing
"local in character and is not an extensive tract of land"	Large trees predating residential development The whole area covers approx. 1.63ha

Policy Sixteen

Conserving non-designated heritage assets

Objective Eleven

Protect and maintain archaeological and built heritage assets deemed to be of value to the community.

a) The Neighbourhood Plan identifies the buildings and structures, as listed in Appendix D: Non-Designated Heritage Assets by way of their local architectural or historic interest.

The objective of policy sixteen is to protect the buildings of character within the town as they are a vital addition to the town centre offering, providing joy and interest to the eye and a physical link to the past. They are a key part of what attracts visitors to the town and thereby help the local economy.

Reasoned justification for Policy Sixteen

77. Within the Moreton-in-Marsh Parish boundaries are assets of historic interest, and many buildings and structures of Grade II and Grade II* listed status some of which are over 400 years old. See Appendix D – "Non-Designated Heritage Assets". Listed buildings are identified by the Secretary of State as being of "special architectural or historic interest" and as such are worthy of special protection.

78. Throughout the Parish there are also buildings which, while not listed, are of good quality, design and appearance, are important features in their own right and which also contribute to the character and appearance of an area. They illustrate, and are reminders of, the historical development of an area and are worthy of retention wherever possible.

79. Communities cohere and thrive through an awareness of their shared endeavours, past and present and it is important that any new development respects the historical past of the area.

80. Moreton-in-Marsh has a distinctive character, which has been partly shaped by its vivid history.

81. Community consultation showed strong support for the historic environment, with 'historic' and 'picturesque' 2 of the most popular words used to describe the town.

NPPF Paragraph 216 and CDC Local Plan policy EN12[40] both highlight the importance of non-designated heritage assets. Paragraph 10.12.1 of the CDC Local Plan goes on to explain that there is no comprehensive list of non-designated heritage assets available for the Cotswold District.

[40] CDC Local Plan Policy EN12

Policy Seventeen

Enhancing Biodiversity

Objective Thirteen

Preserve and increase opportunities for biodiversity net-gain.

1) Moreton-in-Marsh's biodiversity & biodiversity assets shall be maintained, protected, consolidated, extended and enhanced as appropriate to their existing designations and biodiversity status. Development that negatively affects these sites or fragments the network will not be supported unless appropriate mitigation is incorporated within the proposal.
2) New development proposals should demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they enhance and link into the existing ecological network and contribute to its consolidation.
3) Such features should be designed to maximise the opportunities for enhancing the Ecological Network. All new development should maximise opportunities to create new ecological assets and links into areas where opportunities are as yet unidentified on maps within the Neighbourhood Plan.
4) Development proposals should result in a net gain for biodiversity within the parish.
5) Development will also:
a) Protect and enhance features of biodiversity interest of value on and adjacent to the development site, incorporating and integrating them into development proposals, maintaining appropriate buffer zones between new development and the green network,
b) Provide new tree planting, Priority Habitats, wildlife friendly landscaping and ecological enhancements (such as mixed native hedgerows, wildlife ponds, bird nesting and bat roosting features) wherever practicable.
6) In exceptional circumstances where the need for development clearly outweighs the loss of biodiversity units within the development site then off-site biodiversity offsetting to ensure that a net gain for biodiversity is achieved will be supported.
7) Spatial plans for development within the Special Landscape Area (SLA) will need to demonstrate that mitigation measures in respect of biodiversity and land use ensure the viability of the surrounding Cotswold National Landscape.
8) Any development of agricultural land graded 1, 2 or 3 will need to demonstrate that consideration has been given to food production, climate change, flooding, wildlife and habitat considerations.
9) Where SuDS are being created, these should be multi-functional to maximise opportunities to enhance biodiversity.

Moreton-in-Marsh partially sits in the Cotswold National Landscape and a Special Landscape Area and has strong connections with the countryside and agriculture. This not only benefits health and well-being of the local residents and the local flora and fauna but also is important to Moreton's economy through the income generated from agriculture and tourism. It is important to residents that the town maintains its green and leafy environment and connections to the surrounding countryside. In particular, the town is blessed with a broad High Street flanked by historic buildings and an avenue of trees which help to give the town centre its unique appeal. Trees combat climate change in a number of ways including reducing air and noise pollution, providing habitats for urban wildlife, providing green, leafy cooling for pedestrians and absorbing large amounts of water to reduce the risk of flooding. In addition, on Moreton's High Street, they provide a natural barrier between the busy road and the pedestrian areas.

Reasoned justification for Policy Seventeen

82. Wildlife habitats are subject to a range of pressures, including those from development. New development can cause direct loss and degradation of wildlife habitats fragmenting the ecological network and hindering the movement of wildlife through the landscape. Harm can be caused by the degradation, narrowing or severance of corridors (which includes the semi-natural habitats next to them) by the introduction or enlargement of barriers such as buildings, roads, hard landscaping (e.g. tarmac, fencing) or inappropriate landscaping (such as laurel or leylandii hedges) artificial lighting, and by the culverting or re-direction of watercourses. The intent of this policy is to ensure that such harm does not occur.

83. Conversely, development can have a positive impact on biodiversity by creating new and restoring neglected habitats and by providing high quality links between them. For example, new ponds can be created and existing ones restored, as part of well-designed sustainable drainage systems. Also, new semi-natural habitats can be created as part of a landscaping or off-setting scheme and the landscaping within a development (including gardens and parks) can be designed to maximise its value for wildlife such as by using native trees and hedgerows. The intent of this policy is to ensure that these benefits are realised.

84. The NPPF paragraph 187[41] says Planning policies and decisions should contribute to and enhance the natural and local environment by:

(d) "*minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*"

85. Paragraph 192 further states that plans should:

a) "*Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

86. In July 2019 CDC declared a climate emergency. One of the main responses to this is to ensure the Local Plan is 'green to the core'.

87. In July 2020, CDC declared an ecological emergency. One of the main responses to this is 'promoting tree and woodland planting and re-wilding in the right places and with the right species to maximise wildlife value, carbon sequestration and other benefits.' And 'taking a leadership role on the ecological emergency and nature recovery in the Cotswolds'.

88. The CDC Climate Emergency Strategy 2020-2030 (para 4.3) states "..Our trees, and all the wildlife they support, are on the frontline of climate change…This is a stark reminder of the need to take immediate action on climate change."

89. In June 2018 an investment of £31,000 was made in a scheme run by the Gloucestershire Wildlife Trust (GWT) as part of the European Regional Development Fund (ERDF) Wild Towns Project to improve areas of the town.

[41] *National Planning Policy Framework paras 174 a, 179 a & b*

90. CDC Local plan (para 10.4.4) states 'Trees, hedgerows and woodlands play a major part in establishing the character of the Cotswold landscape and make a valuable contribution to the ecological balance of the area, particularly veteran trees, ancient woodland and hedgerows.
91. Policy EN7 goes on to say '1. Where such natural assets are likely to be affected, development will not be permitted that fails to conserve and enhance:
    a. trees of high landscape, amenity, ecological or historical value;
    b. veteran trees;
    c. hedgerows of high landscape, amenity, ecological or historical value; and/or
    d. woodland of high landscape, amenity, ecological or historical value.'
92. Approximately a quarter of Moreton-in-Marsh is the Cotswold National Landscape. In addition, approximately half the parish is as a 'special landscape area' Although not designated, the remaining area of Moreton-in-Marsh is of similar ecological nature and therefore should be treated with the same regard.

Policy Eighteen

Important Views

Objective Fourteen

Preserve important views within the parish.

a) The Plan identifies as Important Views as shown in Appendix E(i)-Important Views Map.
b) Development proposals should be located and designed to take account of the identified Important Views and, where practicable, to enhance or provide greater accessibility to the views concerned.
c) Development proposals throughout the Neighbourhood Area must be sensitive to the importance of maintaining key views.

The objective of this policy is to ensure that the town maintains its links to the surrounding countryside which is important to its residents.

Reasoned justification for Policy Eighteen

93. Moreton-in-Marsh enjoys numerous exceptional views of the surrounding countryside. This is one of the reasons for the thriving tourist industry which has grown up in and around the town.
94. Appendix E (ii) gives description of each view and the reasoning behind its designation.
95. Community engagement showed the importance residents attach to living within an attractive rural area. Many of those residents who responded during community engagement commented on how they valued the rural character of the parish and expressed concerns over threats to it.
96. A substantial part of the Parish is within the Cotswold National Landscape.
97. Rural features that are particularly appreciated are natural verges, natural footpaths, bogs and church bells all add to the rural ambience.
98. The random infiltration of "green windows" between buildings in the settlement areas is particularly liked.
99. The town has many footpaths, surrounded by fields and gently undulating countryside. Even in developed areas the rural feel is maintained by high hedgerows, and residents value the quietness of the lanes and the ability to stroll along them and to stop and talk in safety. Cyclists and horse riders also use the lanes.
100. From several places in the town there are views into the wider iconic landscape. Some recent infilling has already eroded the number and extent of such views and as shown from our consultation value the feeling of openness and rurality of the parish.

101. Where appropriate, planning applications should be accompanied by a supporting landscape assessment demonstrating how these views have been taken into account and explaining the steps taken to preserve or minimise the impact on the views.

Policy Nineteen

Development Boundary

Objective Fifteen
Protect the sensitive natural environment and exceptional rural assets surrounding Moreton-in-Marsh.

The objective of policy nineteen is to limit the spread of housing within Moreton-in-Marsh to be constrained to within the current settlement boundary to limit any damage to the sensitive nature of much of the land outside the settlement boundaries.

a) New development in Moreton-in-Marsh shall be focused within the development boundary.
b) Additional development which would result in Moreton-in-Marsh growing by significantly more than the minimum number of dwellings required by the Cotswold District Local Plan over this period, will not be supported.



Area highlighted on map 2 shows development boundary
(taken from CDC plan policies map)

Reasoned justification for Policy Nineteen

102. Policy DS2 of the Cotswold District Local Plan defines a Development Boundary around the town, within which development will be permissible in principle. It is expected that the bulk of development will be focused within the built-up area of Moreton-in-Marsh. The town needs to accommodate a degree of growth in order to prosper. However, this must be balanced against the need to preserve its role as a largely rural market town which does not encroach unduly on the open countryside that surrounds it.
103. Given the unique and sensitive nature of much of the land outside the settlement boundaries (defined in map 2 above) the community supports building housing within the existing settlement as much as is feasible.
104. Development proposals outside the settlement boundary will not be supported unless they are spatially planned and harms to biodiversity, sustainable land use and Special Landscape Area and Cotswold National Landscape are mitigated.

Policy Twenty

Transport & Active Travel

Objective Sixteen

Create a more connected parish for residents and visitors alike, limiting the need for vehicular travel within the town and offering a genuine choice of transport options to help reduce congestion and emissions, to improve air quality and public health.

a) The provision of accessibility through 'active travel' (non-car) should be the primary focus for development through provision of sustainable travel such as new / improved cycleways, new / improved footpaths and interconnecting small transport hubs and bus corridors.
b) Larger residential schemes (100 dwellings or more) should promote non-car use and have appropriate internal layouts and connections to footpaths and key services.
c) Support will be given to proposals which increase or improve the network of cycle ways, footways and footpaths. New footpaths, where created and officially designated, will be supported.
d) Proposals which harm the following characteristics of public rights of way will be resisted:
1. Safety.
2. Directness.
3. Access and Connections.
4. Attractiveness.
5. Convenience.

e) Proposals should seek, where possible, to create cycle paths so as to provide safe and effective routes across the Neighbourhood Area, and where possible link with the Local Cycle and Walking Infrastructure Plan (LCWIP) and National Cycle Network.
f) Developer or CIL contributions will be sought from all new developments to fund improvements to the existing cycle and footpath networks as well as supporting the provision of new connections, where these have been identified and can be delivered.

The objective of this policy is to reduce traffic within the town by enabling and encouraging other forms of movement through the town such as walking and cycling. This would result in the following benefits: reduced carbon emissions, reduced air and noise pollution, and an increase in health and well-being. It is intended to build on the Gloucestershire Local Transport Plan 2020-2041 at a more local level.

Reasoned justification for Policy Twenty

105. Safe and convenient provision for cyclists, pedestrians and horse riders is an essential part of policies being pursued to reduce the use of the private motor car. New development will, where appropriate, be required to facilitate the opportunity for increased cycle use, walking and horse riding by providing, as an integral part of the development, safe cycle and footpath networks. In assessing the suitability of new routes, proposals should demonstrate that they will not prejudice the effective operation of existing uses, and capacity of existing routes is expanded to support additional residents generated by any new development.

106. This policy is intended to enhance the provision of safe multi-user routes for cyclists, pedestrians and horse riders, as well as providing safe and secure non-vehicular routes to all schools within the parish.
107. Strategic developments in Moreton-in-Marsh, where practical, should be designed to provide dedicated footpaths and cycleways which will provide access for pedestrians and cyclists towards the existing built-up areas of Moreton-in-Marsh and the key focal points within it (e.g. the station, schools, the retail centre), as well as enabling access to the green belt and wider countryside.
108. With the growth in the population that will occur through any development in Moreton-in-Marsh, movement by all modes will continue to become a challenge. The key types of movement can be classed as 'local' and 'strategic':
    - 'Local' movement is principally within Moreton-in-Marsh, to key points in the town such as the school, the railway station, the retail centre. It also includes people accessing community infrastructure and leisure activities – even as simple as dog walking.
    - 'Strategic' movement is mainly to areas outside the parish, principally the larger towns and road network.
109. The NPPF (2024) para 109e states, "*identifying and pursuing opportunities to promote walking, cycling and public transport use' (*at the earliest stages of plan making and development proposals)". For Moreton-in-Marsh, the benefits of investing in walking and cycling include:
    - providing genuine alternatives to the private car as a means of accessing key shops and services, such as the local schools.
    - providing health benefits through increased walking and cycling.
    - facilitating less congestion at busy times by encouraging children walking to and from school and people walking to the station and shops rather than 'jumping in the car' for a short journey.
    - providing a safer environment for the community, including for vulnerable users.
110. Community engagement respondents showed 79% of respondents would support more dedicated walking and cycling routes within the town.
111. 59% believed traffic in the town is a big problem.
112. All walkway routes are expected to consider accessibility requirements for those with mobility difficulties such as the elderly and young children.

Community Aspiration 3
Public transport

Work with providers to improve public transport to and from Moreton-in-Marsh and create a transport hub to deliver these transport objectives

Glossary of terms that appear in the Neighbourhood Plan

Affordable housing – Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers). The definition includes the following: Affordable housing for rent, Starter homes, Discounted market sales housing and Other affordable routes to home (for full definition see NPPF).

Amenity – A positive element or elements that contribute to the overall character or enjoyment of an area.

Area of Outstanding Natural Beauty (AONB) – An area of countryside designated as nationally important for conservation due to its significant landscape value**.**

Biodiversity – A measure of the number and range of species and their relevant abundance in a community.

Biodiversity Action Plan – A strategy prepared for a local area aimed at conserving and enhancing biological diversity.

Brownfield Land – Previously developed land that is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.

Change of Use – A change in the way that land or buildings are used (see Use Classes Order). Planning permission is usually necessary in order to change from one 'use class' to another.

Cotswold District Council (CDC)– The local authority for the Parish of Moreton-in-Marsh.

Community Facilities – Facilities providing for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community.

Community Infrastructure – The basic facilities, services and installations needed for the functioning of a community or society. It includes community buildings and halls, leisure facilities, cultural facilities, education services, healthcare facilities and renewable energy installations.

Consultation Statement– A statement accompanying the Neighbourhood Plan for Moreton-in-Marsh is required by the Localism Act. The statement must set out what consultation was undertaken and how this provided the basis of the NP.

Cotswold National Landscape – An area of countryside designated as nationally important for conservation due to its significant landscape value**.** Previously known as Area of Outstanding Natural Beauty.

Countryside – The area outside a settlement boundary.

Development – Defined under the 1990 Town and Country Planning Act as "the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any building or other land". Most forms of development require planning permission.

Development Plan – A plan comprising the Development Plan Documents contained within the Local Development Framework. This includes adopted local plans and neighbourhood plans also it is defined in Section 38 of the Planning and Compulsory Purchase Act 2004.

Developer – A person or a company that buys land and builds houses, offices, shops, or factories on it, or buys existing buildings and makes them more modern.

Dwelling – A self-contained building or part of a building used as a residential accommodation, and usually housing a single household. A dwelling may be a house, bungalow, flat, maisonette or converted farm building.

Environmental Impact Assessment – UK environmental assessment means an assessment carried out in accordance with an obligation under the law of any part of the United Kingdom of the effect of anything on the environment. It is an analytical process that systematically examines the possible environmental consequences of the implementation of plans, projects, programmes and policies.

Evidence Base – A researched, documented, analysed and verified basis for preparing the Moreton-in-Marsh NP.

Examination – An independent review of the NP carried out in public by an Independent Examiner.

Green Corridors – Green spaces that provide avenues for wildlife movement, often along streams, rivers, hedgerows or other natural features, which connect green spaces together.

Greenfield – Land on which no development has previously taken place.

Independent Examiner – Anyone with appropriate qualifications and skills and who meets certain requirements set out in the Localism Act. This could be a planning consultant or other planning professional, an employee of another local authority or a planning inspector.

Habitats Regulation Assessment (HRA) – A procedure to assess the impact of a plan or policy on an internationally designated site protected for nature conservation, designed to ensure that plans and policies will not cause significant harm to such sites.

Infill Development –The filling of a small gap (up to two dwellings) in an otherwise built-up frontage in a recognised settlement.

Infrastructure – All the ancillary works and services which are necessary to support human activities, including roads, sewers, schools, hospitals, etc.

Local – Within the Neighbourhood Plan Area.

Local Wildlife Sites – Sites with 'substantive nature conservation value', they are defined areas identified and selected locally for their nature conservation value based on important, distinctive and threatened habitats and species with a national, regional and local context.

Localism Act – An Act of Parliament that became law in April 2012. The Act introduces a new right for local people to draw up 'Neighbourhood Development Plans' for their local area.

National Planning Policy Framework (NPPF) – Initially published by the Government in 2012, most recently updated in December 2024, it sets out the Government's planning policies for England and how these are expected to be applied.

Neighbourhood Plan (NP) – The full title in the Localism Act is 'Neighbourhood Development Plan'. It is a document for a defined area, subject to examination in public and approval by local referendum. It will be used in the determination of planning applications.

Open Space – All spaces of public value, including public landscaped areas, playing fields, parks and play areas, and areas of water such as rivers, canals, lakes and reservoirs, which may offer opportunities for sport and recreation or act as a visual amenity and a haven for wildlife.

Plan Period – The period for which the Moreton-in-Marsh NP will set policy for the NPA. This will be from the adoption of the plan until 2043 by agreement between Moreton-in-Marsh Town Council and CDC.

PROW – Public Right of Way A public right of way is a highway over which the public have a right of access along the route.

Reasoned Justification - The supporting text in a development plan or associate document explaining and justifying the approach set out in the policies contained in the document.

Referendum – A general vote by the electorate on a single policy question that has been referred to them for a direct decision. In the case of the NP, the referendum will decide whether to adopt the plan or not.

Residential Amenity – The quality of the living environment for occupants of a dwelling house including its associated external spaces.

Rural Area - The area outside identified settlements.

Second Homeowner - Someone occupying a property as a second home and occupying principal residence elsewhere.

Sensitive Development – Blends with and compliments existing properties in all aspects of footprint, shape, and height, incorporating some of the local features with regards to brickwork, window design, roof pitch materials of construction etc.

Settlement Boundary - A settlement boundary defines the limits of development and makes clear where development will and will not be allowed, regardless of other constraints.

SSSI – Site of Special Scientific Interest**.**

Sustainability Appraisal – A process of appraising policies for their social, economic, and environmental effects, which must be applied to all Development Plan Documents.

Steering Group – A group of local people representing the Town Council, community groups and businesses that collated and guided the work on the NP.

Strategic Environmental Assessment (SEA) – Assessments made compulsory by the European Directive (the SEA Directive). To be implemented in planning through Sustainability Appraisals of Development Plan Documents and NPs where required.

Strategic Housing and Land Availability Assessment (SHELAA) – An approach to evaluating land for development based on its suitability, availability and viability. Its aim is to ensure sustainable development.

Transport Assessment – An assessment of the availability of, and levels of access to, all forms of transport. In relation to a proposed development, it identifies what measures will be required to improve accessibility and safety for all modes of travel particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated effects of the development.

Wildlife Corridor – Strips of land, for example along a hedgerow, conserved and managed for wildlife, usually linking more extensive wildlife habitats.

Moreton-in-Marsh Neighbourhood Plan

2018 - 2043

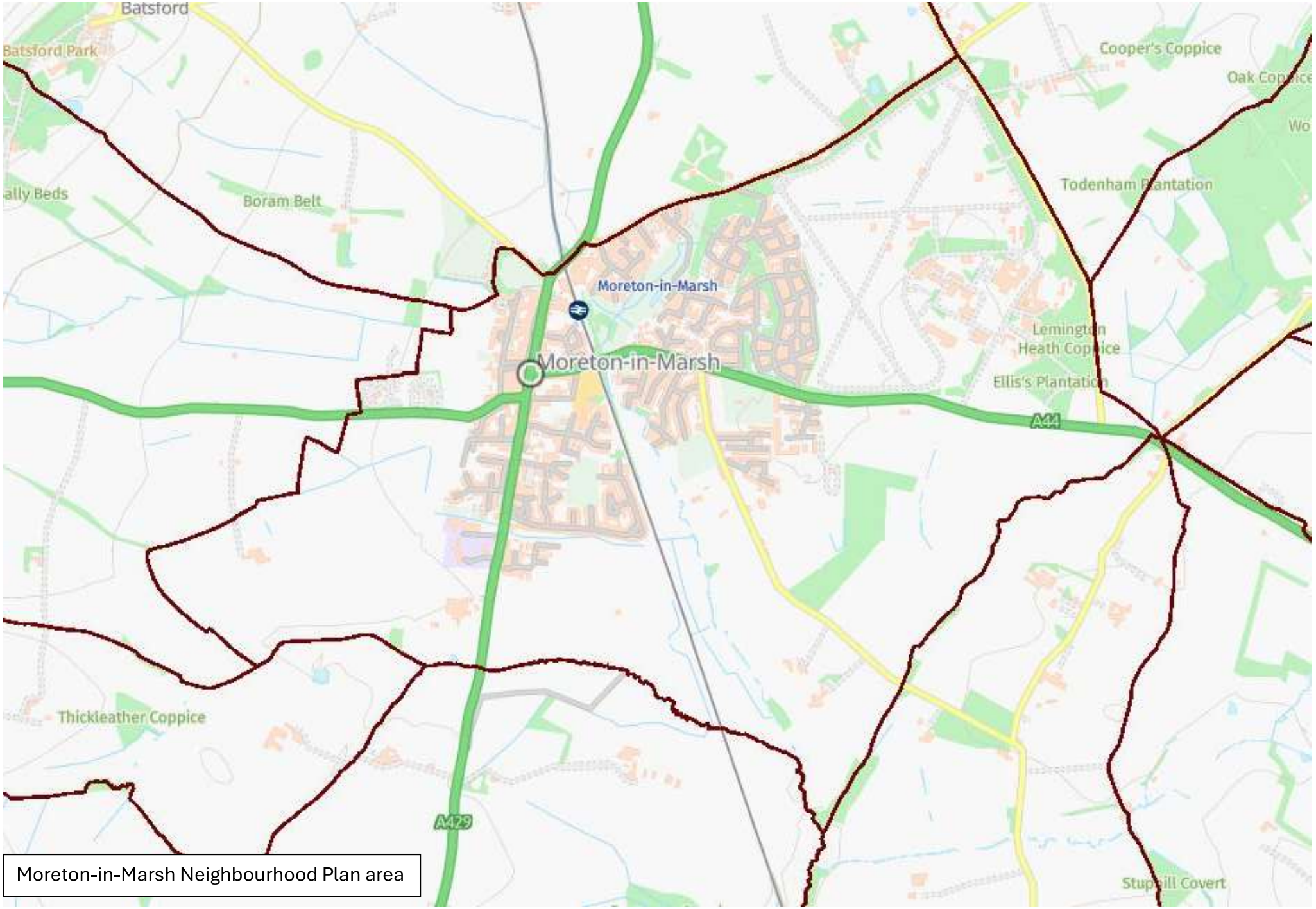
Appendices



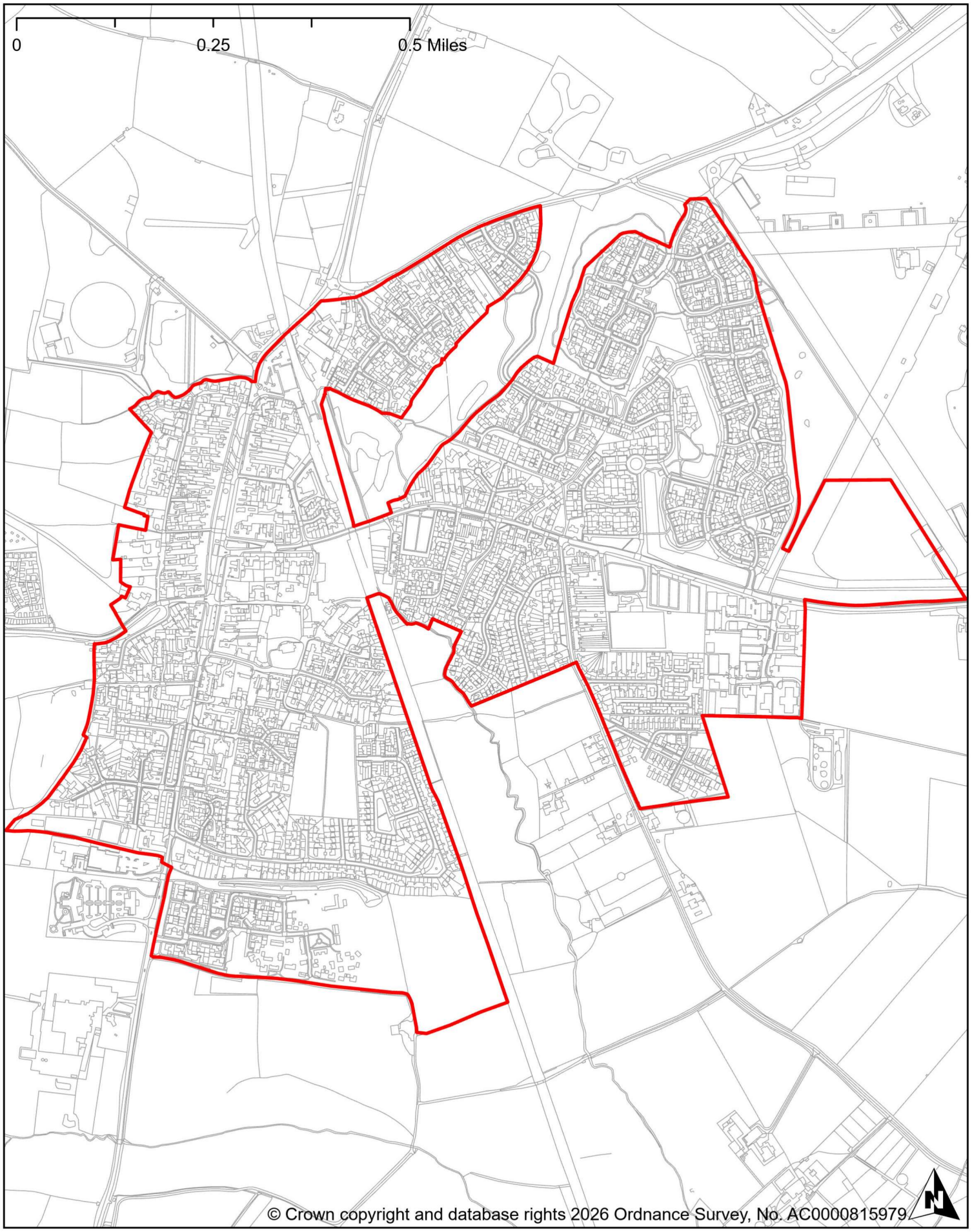
Moreton-in-Marsh Neighbourhood Plan

2018 - 2043

Policies Maps

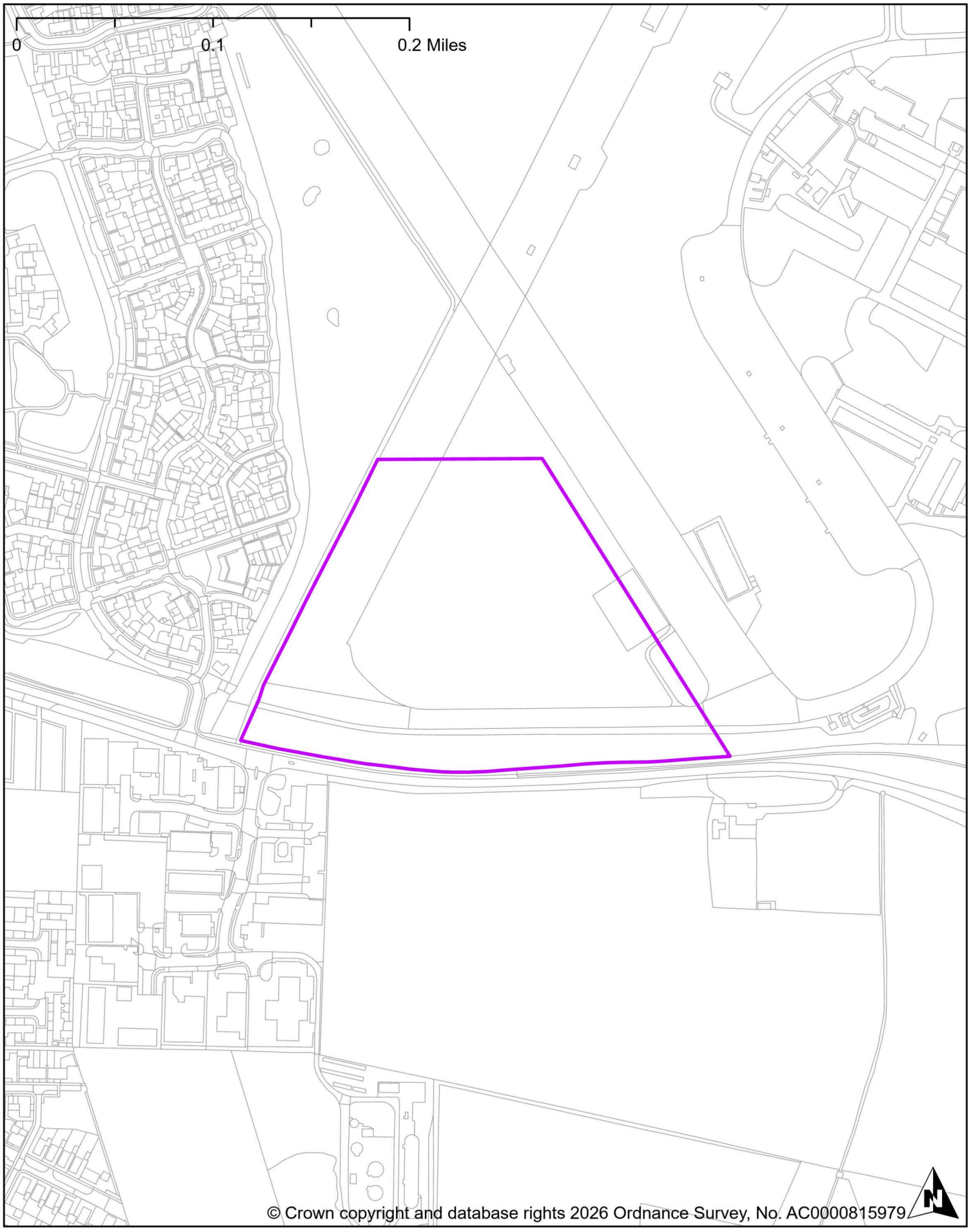


Moreton-in-Marsh Neighbourhood Plan area



Moreton-in-Marsh Development Boundary

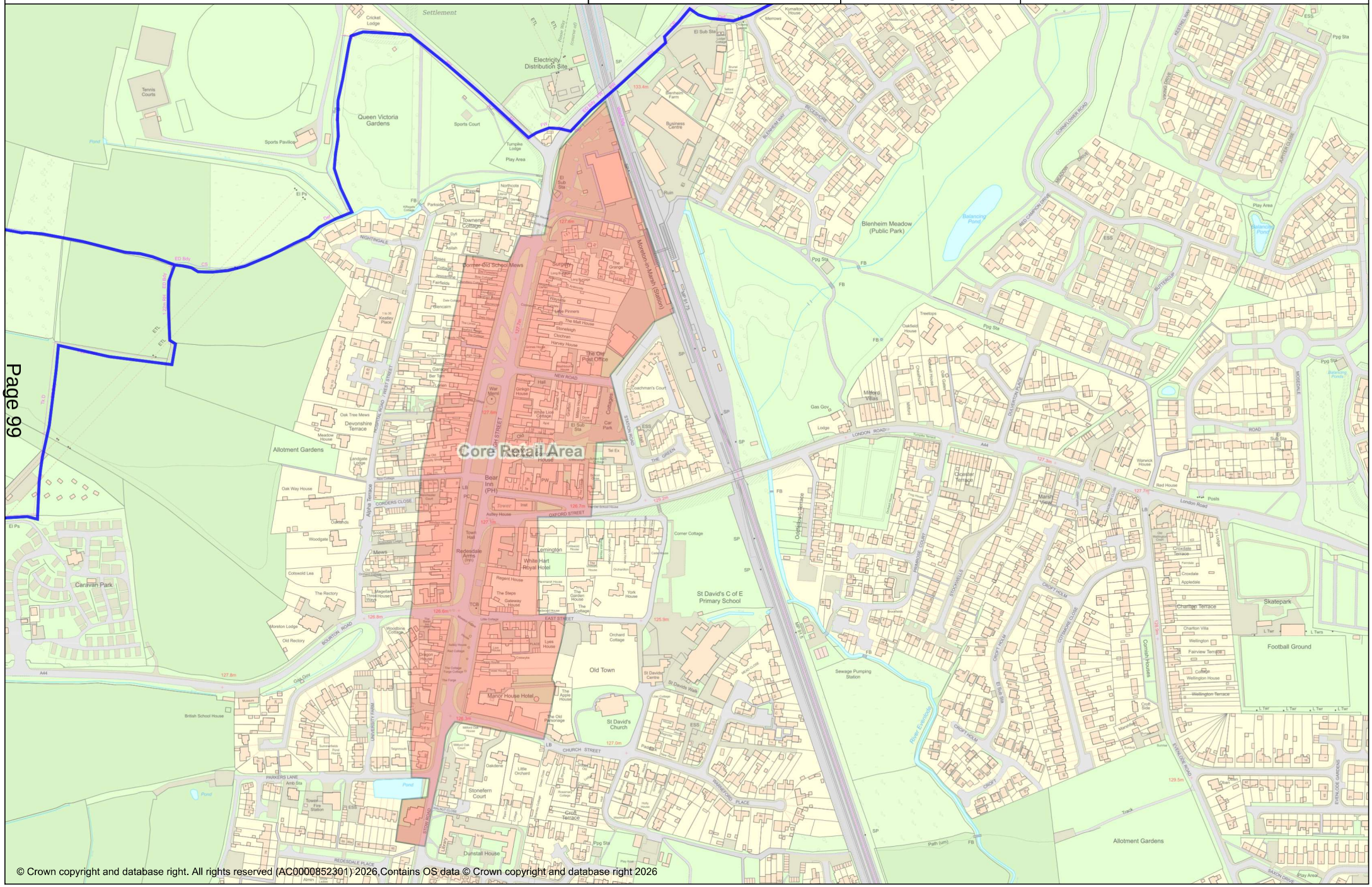
COTSWOLD District Council



Moreton-in-Marsh Employment Land

COTSWOLD District Council

Core Retail Area	Moreton-in-Marsh	PARISH ONLINE
	Author:	0 20 40 60 80m
	Date: 20/03/2026	**Scale:** 1:5000 @ A4



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Designated Green Spaces - Draft	Moreton-in-Marsh	
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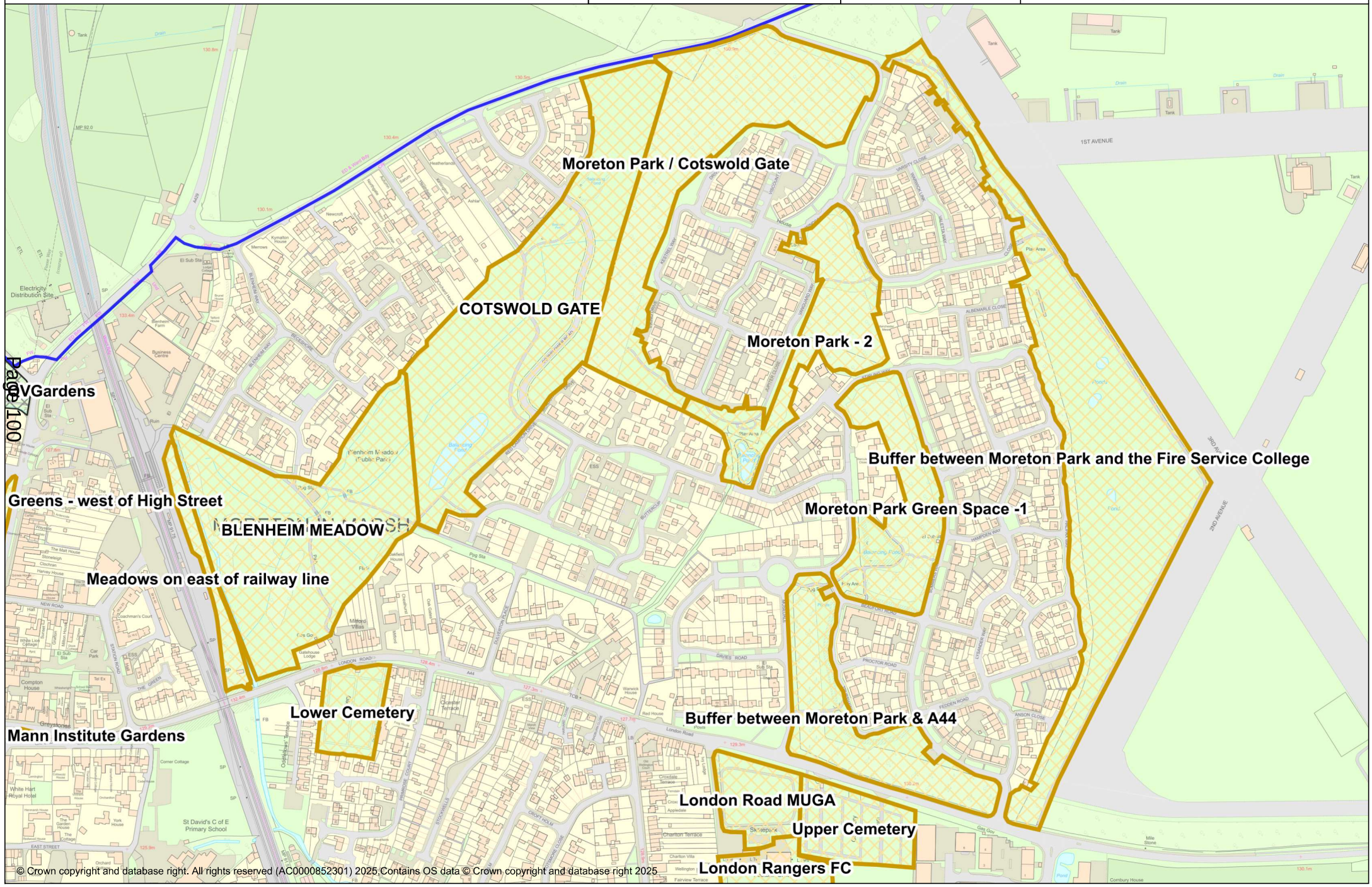
	Date: 18/01/2025	



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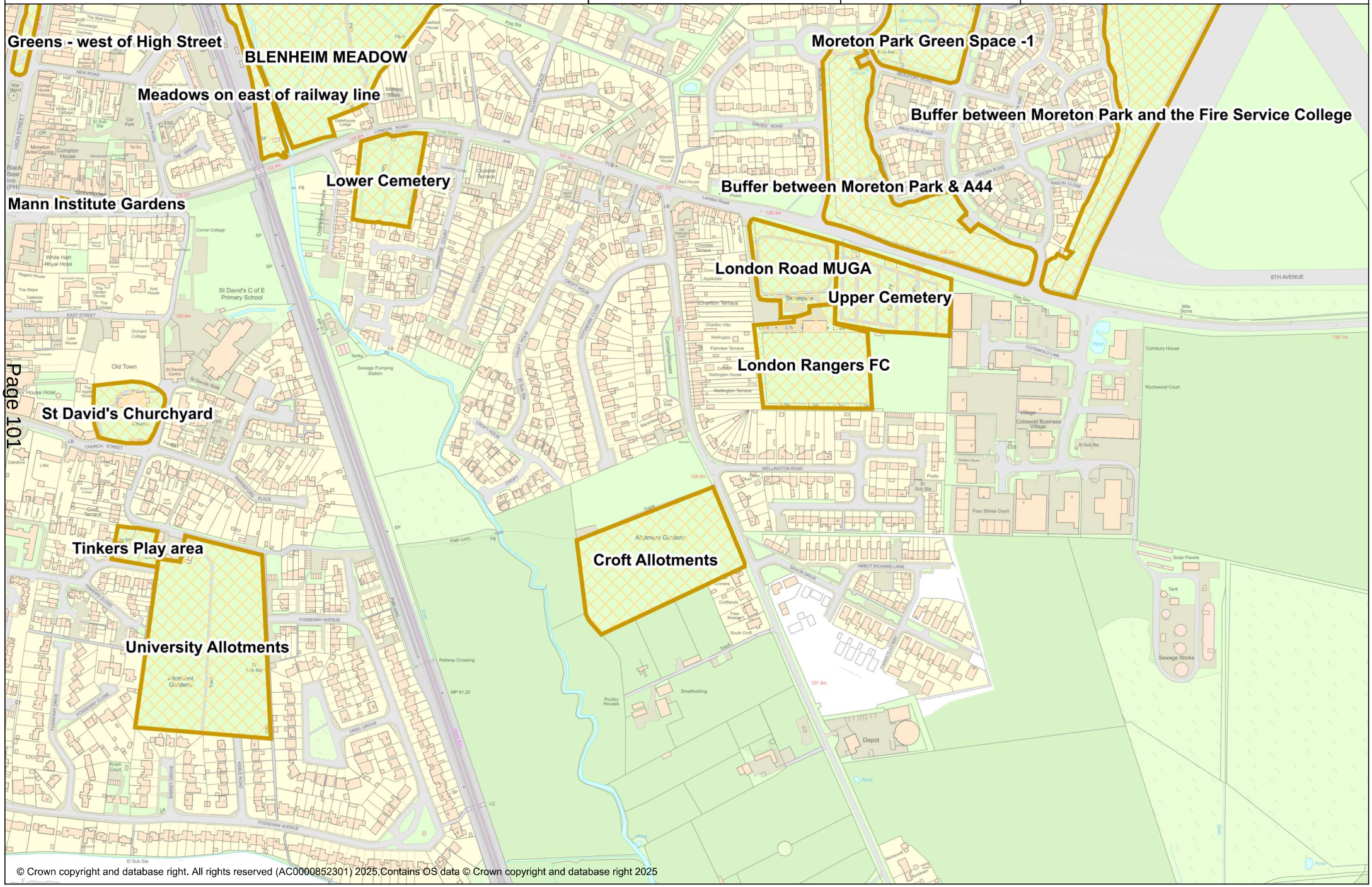

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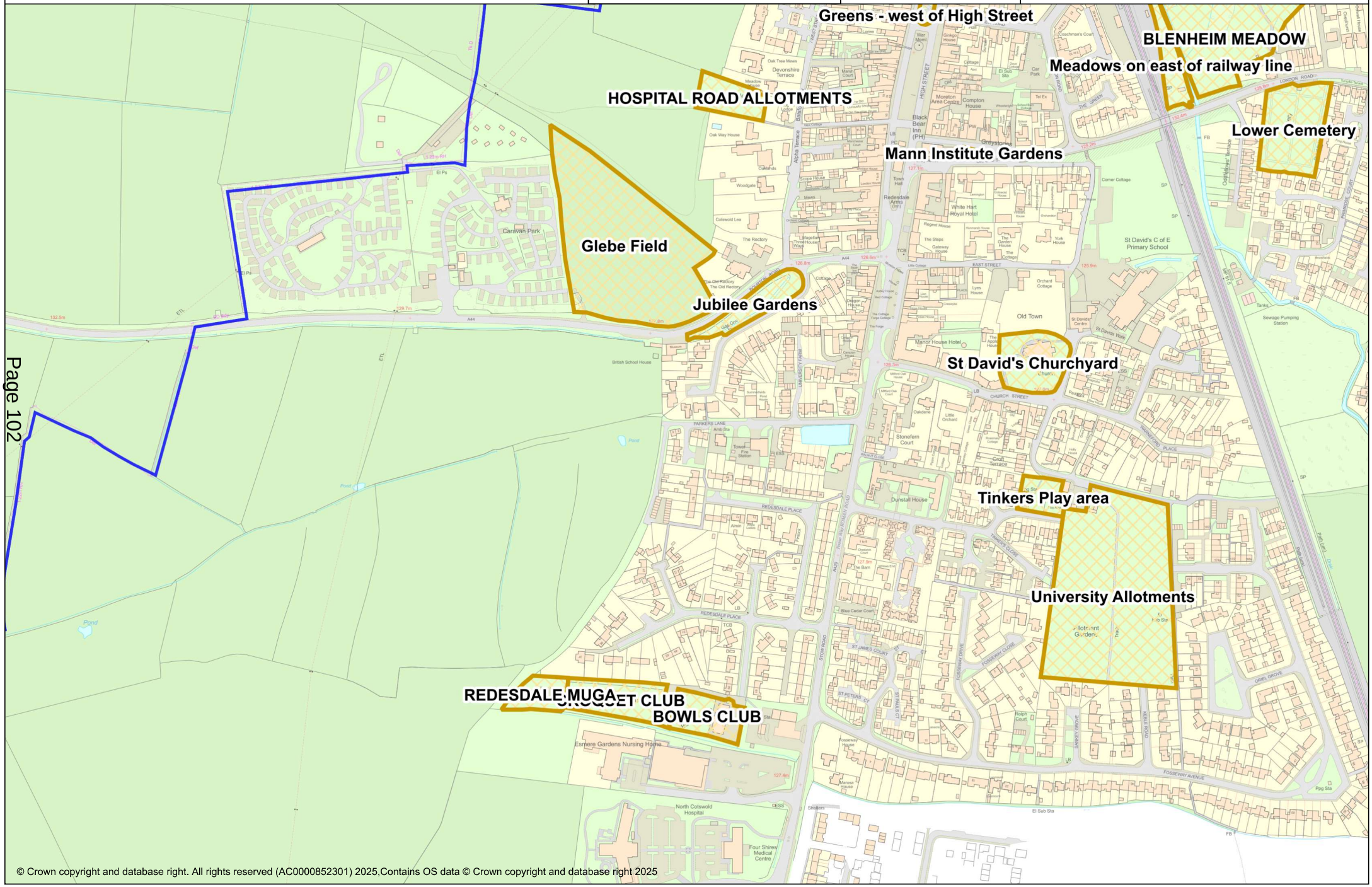

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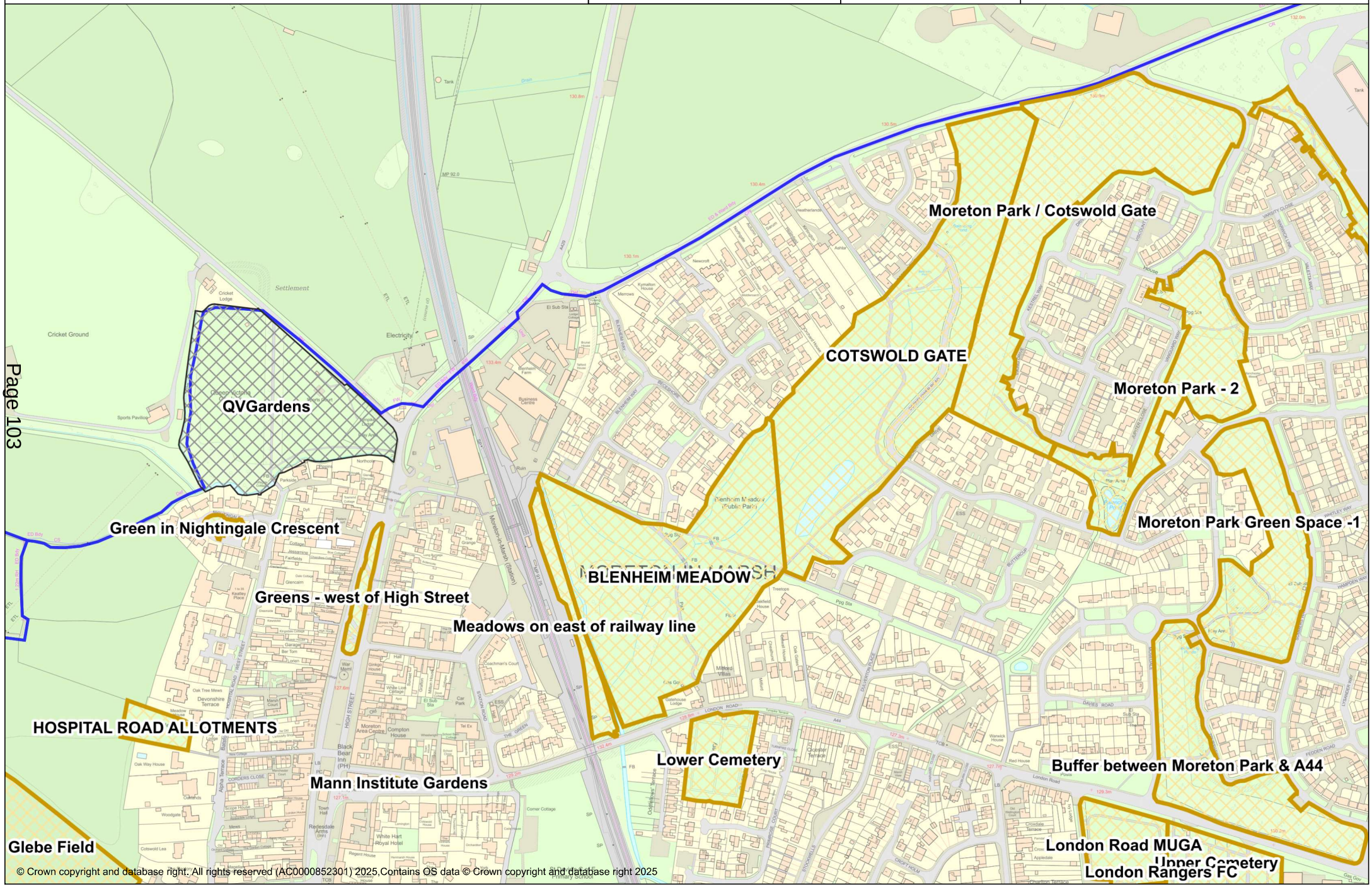

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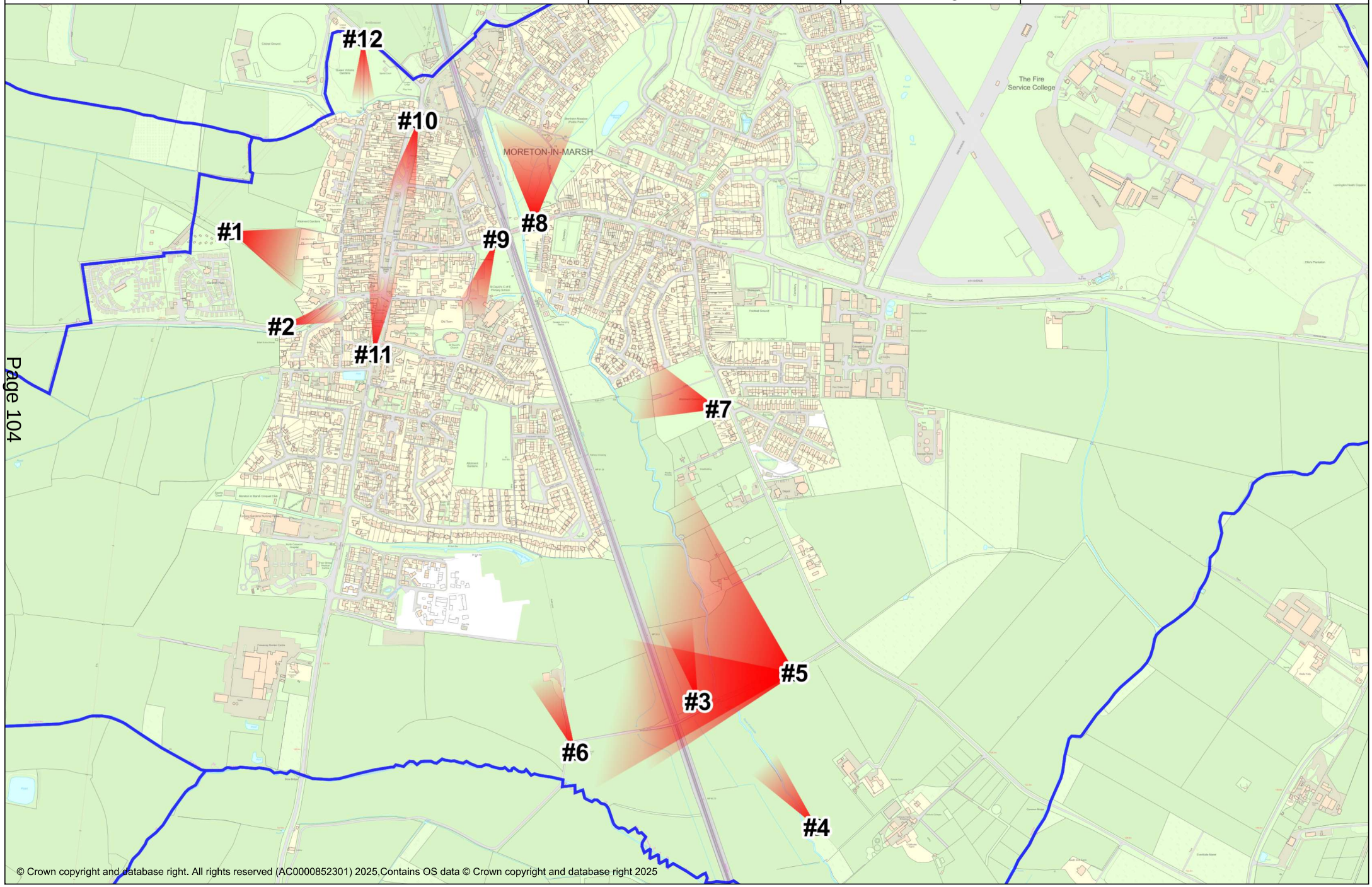

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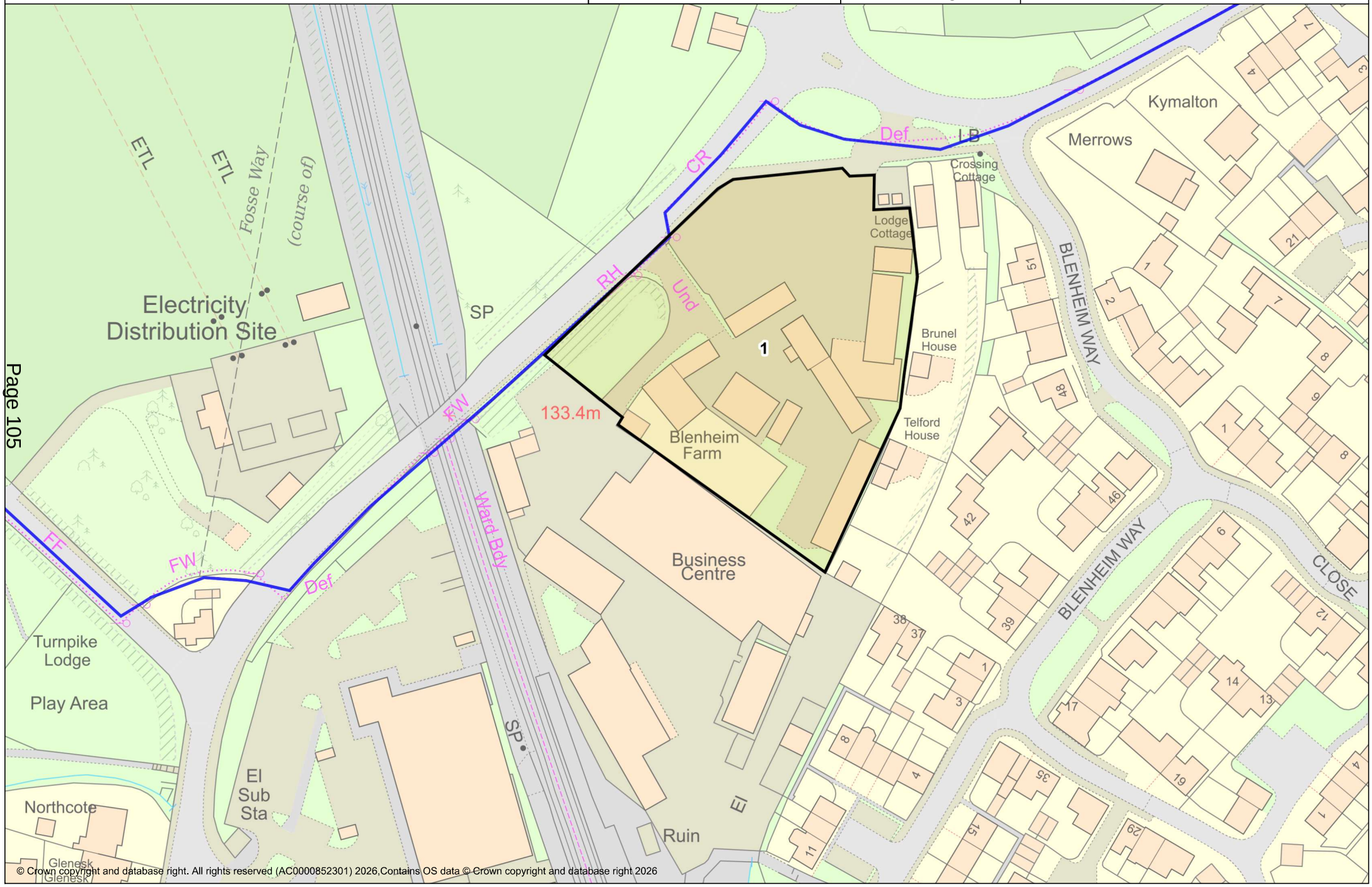

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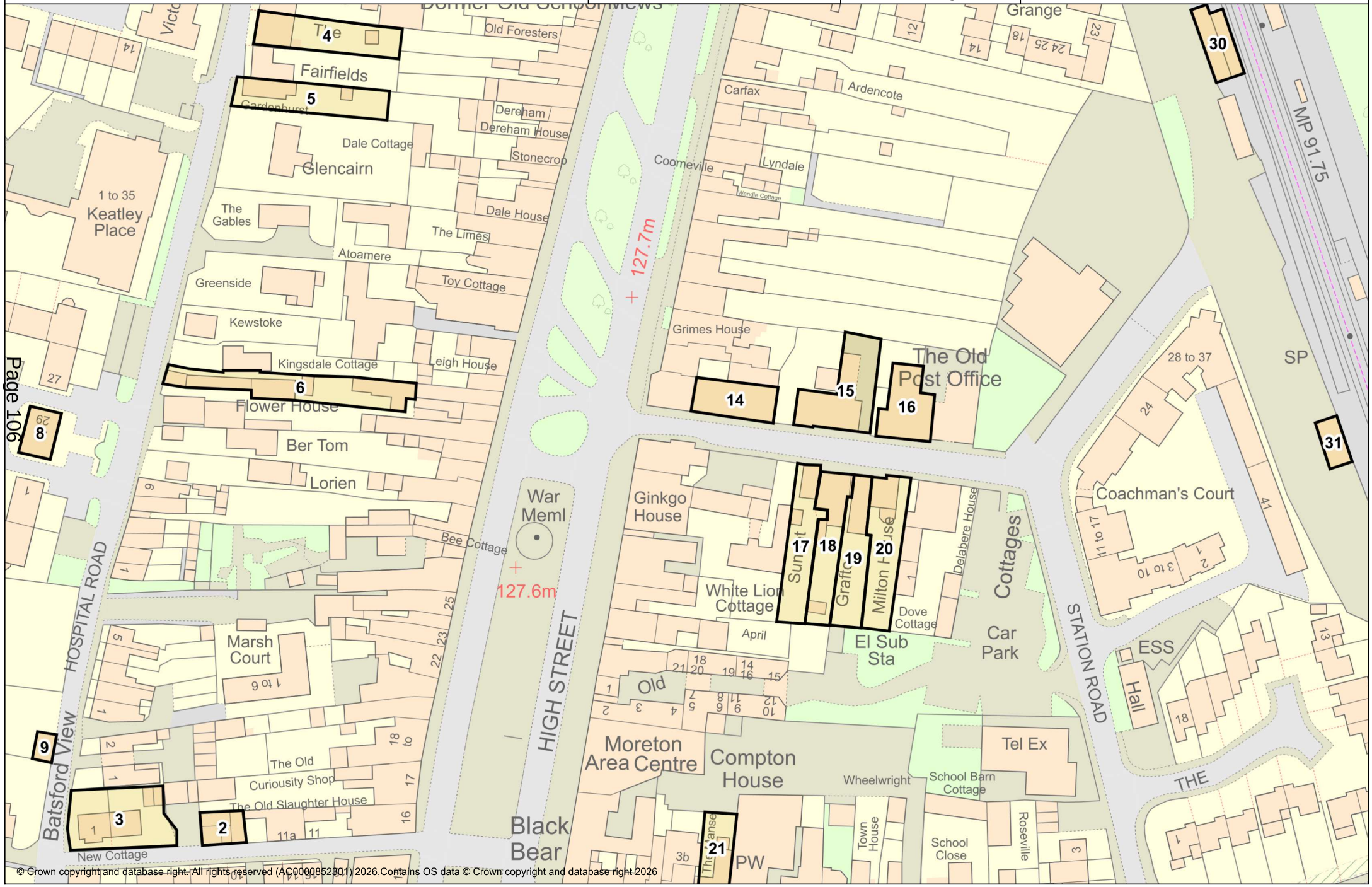

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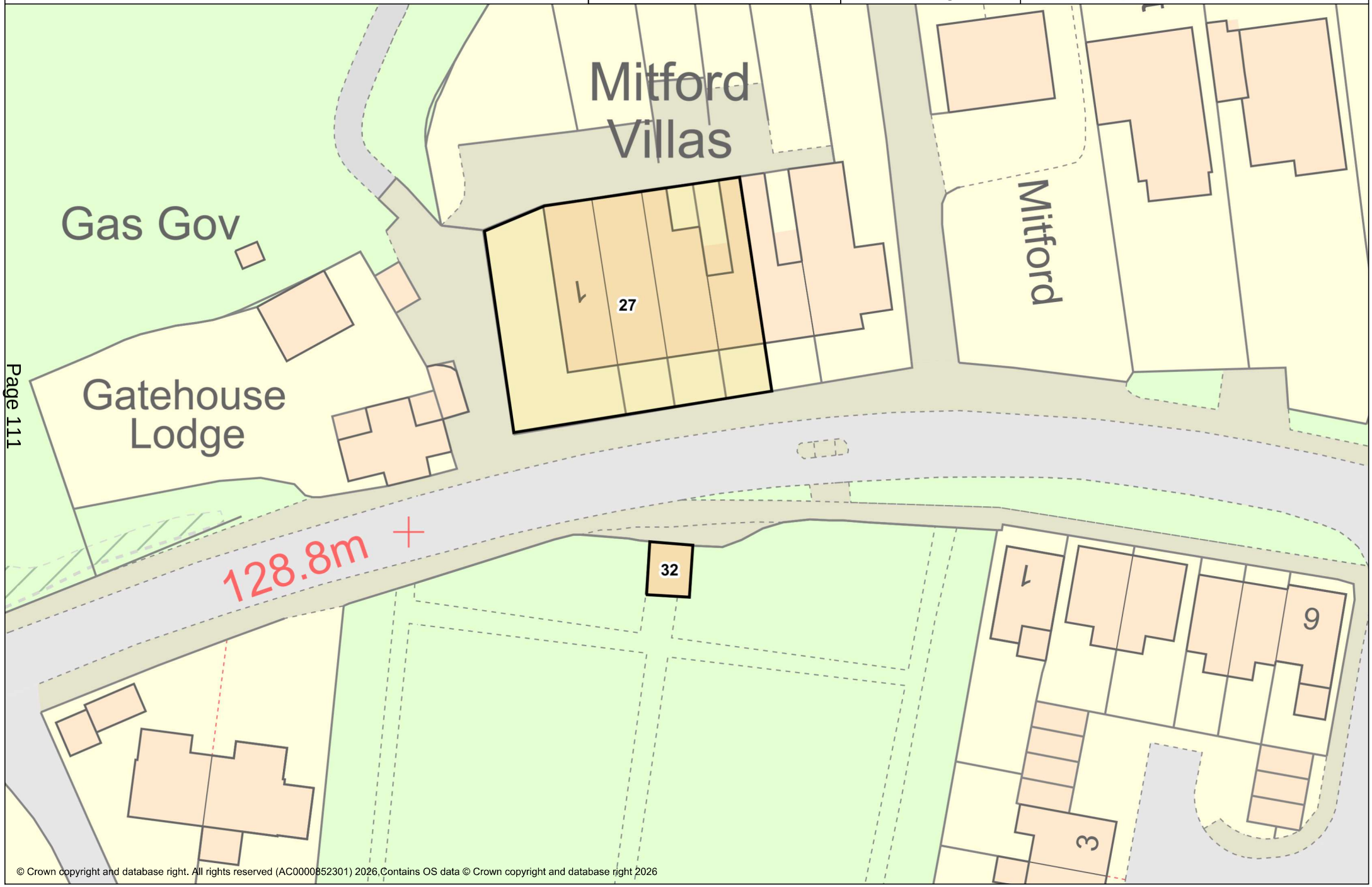

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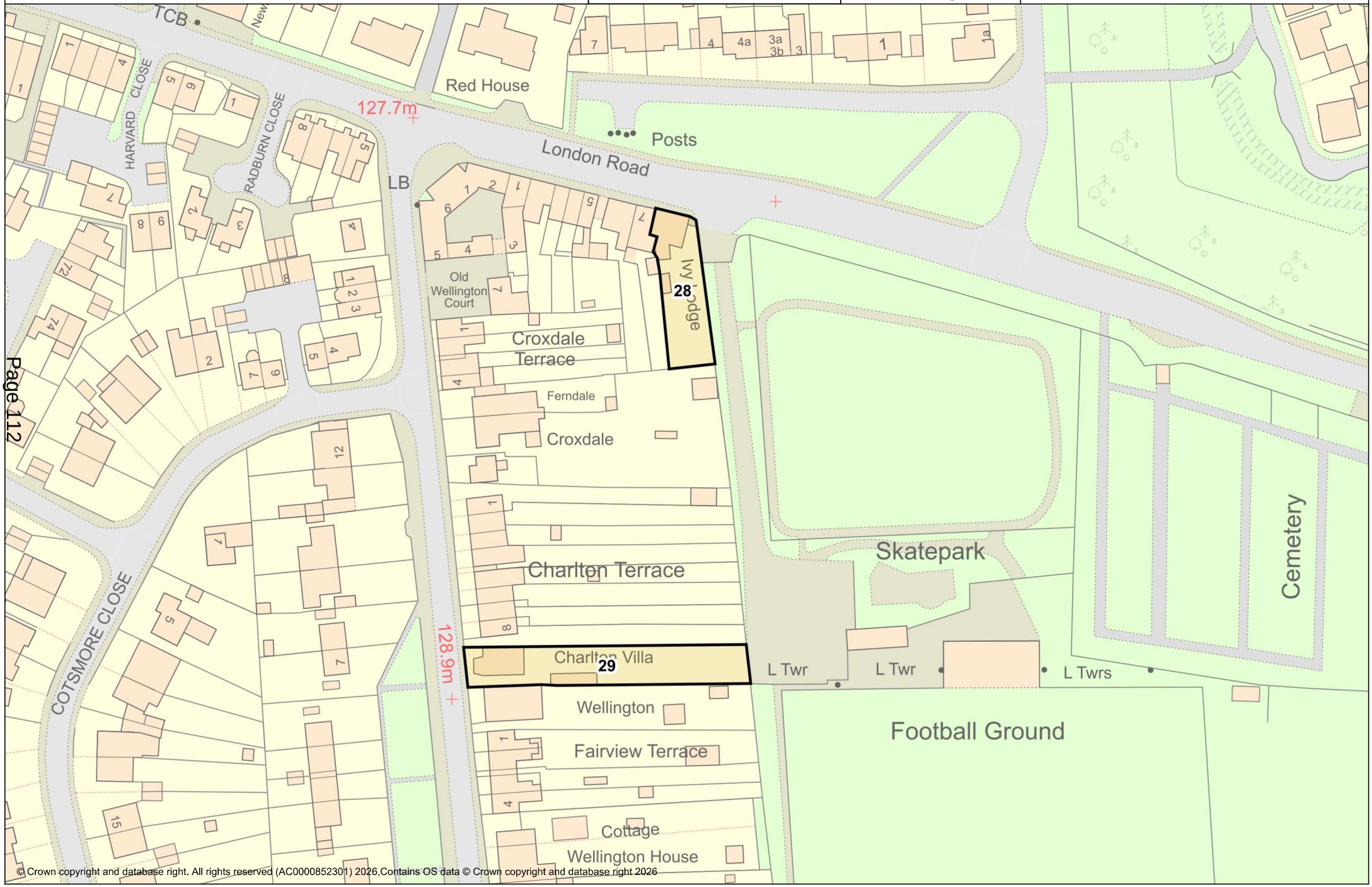

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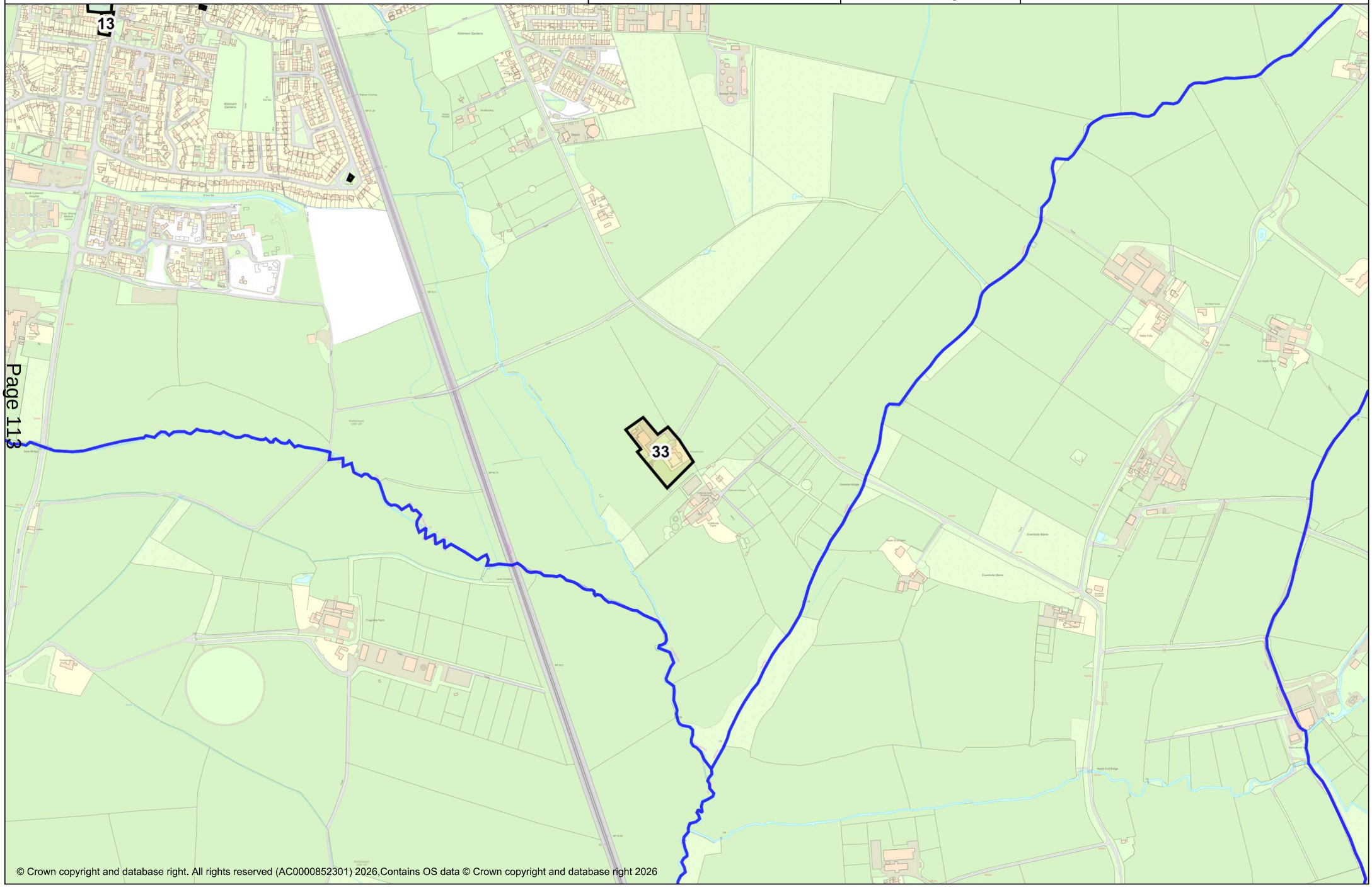

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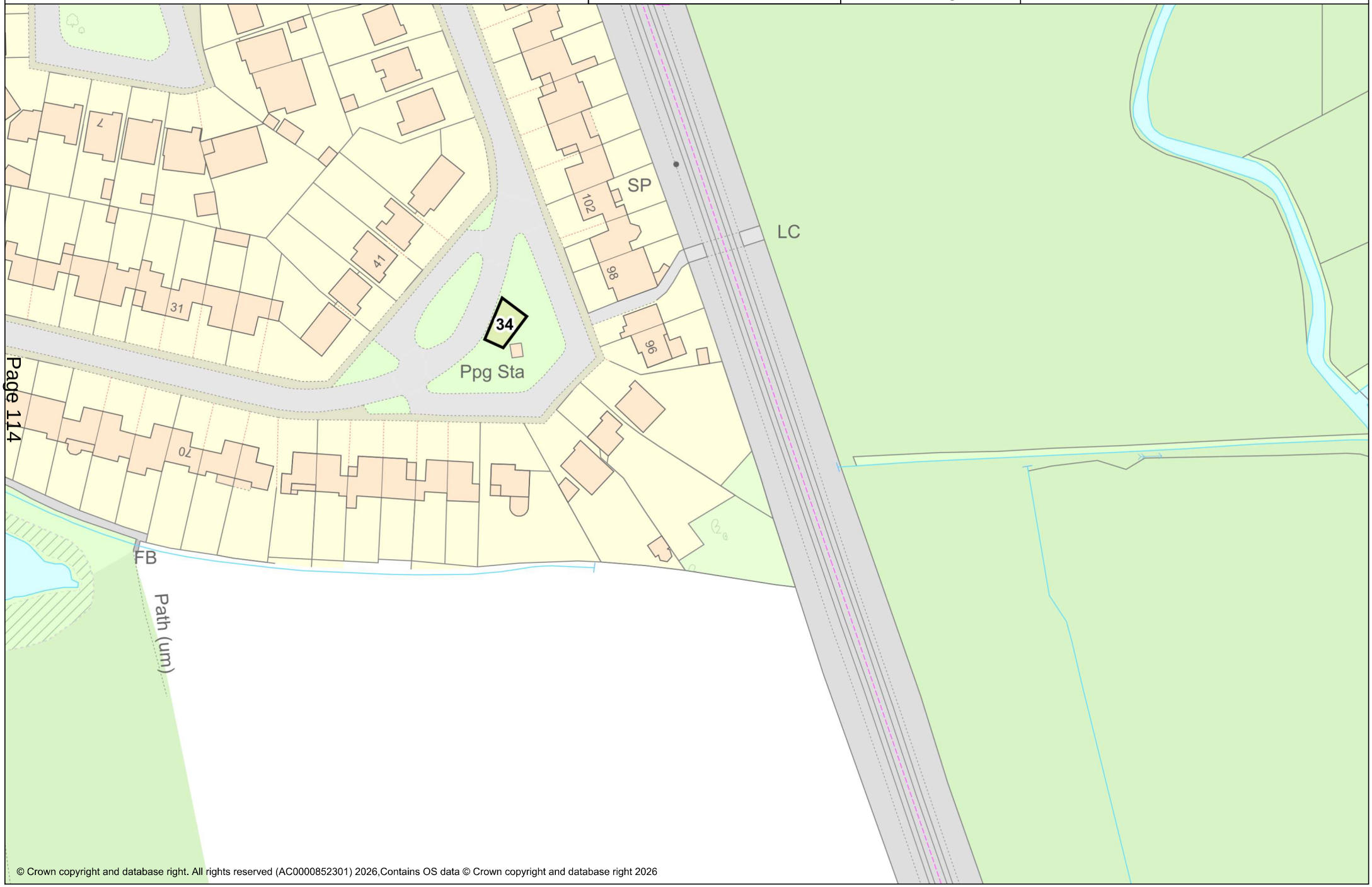

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Appendix A



MORETON-IN-MARSH COMMUNITY DESIGN STATEMENT

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“The home healthy, the house beautiful, the town pleasant”. Planning Act 1909

VISION STATEMENT FOR MORETON IN MARSH

1.0 It is our aspiration to establish a default set of design principles, as part of forthcoming planning reforms, that will ensure future developments in Moreton-In-Marsh will be both well designed and beautiful. As an historic market town at the gateway to the Cotswolds National Landscape, protecting the unique and special character of Moreton as it continues to grow is of upmost importance. The Neighbourhood Plan and Community Design Statement therefore seek to support the *management* of change in the Town, not to prevent it.

1.1 The town centre is characterised by a particularly wide high street lined with many elegant 17th and 18th century buildings built in the honey-coloured Cotswold stone and separated by green areas of grass and trees. The buildings now have a mix of uses including retail, hospitality, services and residential. Some examples include the White Hart Royal, a former manor house in which King Charles I sheltered during the Civil War and the rare Curfew Tower with its original clock and bell. In the centre is the Redesdale Hall, the town’s main public hall, which regularly holds community events as well as antiques and craft fairs. The town sits in a very rural setting, with attractive scenery made up of woods and agricultural fields which are threaded with many public footpaths.

1.2 There is a rich variety of architectural styles in Moreton-In-Marsh and any new development should contribute to this variety while being sympathetic to the existing character of this part of the Cotswolds. All new homes should reflect a gathered consensus. Both in the short-term: have greater architect and community involvement in the design, and in the longer-term, where homes built here in the next decade are those most cherished in one hundred years, like Georgian and Victorian architecture are today.

1.3 Building better requires innovation as well as some sensitive imitation – our planning system should support this. The National Planning Policy Framework (DEC 2024) to which we refer, places a solid emphasis on aesthetics. Para 131 “creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve” and features throughout the revised policy document. It was an absence of beauty in new housing that initiated a belief that utility, convenience, and developer profit too often drive development, resulting in mediocre, bland, ubiquitous buildings. Now the revised NPPF (Para 135), states that new developments should be “visually attractive as a result of good architecture, layout and appropriate and effective landscaping”.

1.4 Developers in Moreton-In-Marsh will be required to provide people with well-designed, aesthetically pleasing and affordable homes that make them feel better connected to nature and the surrounding countryside and provide a sense of fully belonging to the Cotswold National Landscape.

1.5 We want Moreton to continue to be a unique, pleasant, and characterful settlement, where the principles of the first planning act in 1909 are evident: “The home healthy, the house beautiful, the town pleasant”.

CONTEXT & NATIONAL DESIGN CODES

NB This design statement has been prepared as a result of the revised NPPF (2024) guidance: Paras 133 and 134 state: "All local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high-quality standard of design" & "Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents"

2.0 In addition to Moreton-In-Marsh's locally developed guidelines, we wish to ensure that developers pay due regard to current relevant national design guidance, codes, standards, and toolkits, meeting standards and wherever viable, exceeding them.

The Moreton-In-Marsh Design Statement has therefore been prepared in accordance with the National Model Design Code (2021), for Well Designed Places, and with specific reference to the 'Context', the 'Identity' and the 'Built Form' of housing developments.

Particular attention is paid here to the requirements that homes be attractive and distinctive, as well as part of a coherent pattern of development.



Image from National Model Design Code 2021

2.1 Section 3A of the National Design Guide, provides guidance specifically for 'Built Form' and 'Identity'. (Para 53) 'The identity of an area comes not just from its built form and public spaces but from the design of its buildings. This is not about architectural style, but about key principles of building design. All new buildings should relate to the architectural character and materials of the surrounding area, but this should not be interpreted to mean that only pastiche reproductions will be required. Moreton seeks to combine the best of the modern with the history of the past.

Section 3B states that 'An understanding of the context, history and character of an area must influence the siting and design of new development' as set out in Guidance Notes Code Content: Context. This should be informed by:

A) Character studies: All schemes should consider their context and schemes over a specified size should be accompanied by a context study

B) Historic assets: Schemes should respect the historic assets of the site and its surroundings, making use of existing structures where possible'

Chapter 11 paragraph 129 (sections d and e) of The National Planning Policy Framework (2024) state that developments should take into account "the desirability of maintaining an area's prevailing character and setting", and places value on the "importance of securing well-designed, attractive and healthy places".

2.2. The National Planning Policy Framework (NPPF) 2024, Chapter 12, para 132 states that: 'Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers'.

2.3 To facilitate efficient delivery of high-quality development, Local Planning Authorities should endeavour to engage both architects and developers who's work has attracted approbation and/or awards to ensure excellence of design. They should draw on relevant guidance and standards and promote the use of appropriate tools and techniques, such as Design Coding alongside urban design guidelines, detailed masterplans, village design statements, site briefs and community participation techniques. Source: Planning Policy Statement 3: Housing (DCLG, 2006).

The design of new residential properties is important. Developers will be expected to demonstrate in their applications that the design and layout of the proposed development is sympathetic to the character of its immediate surroundings while using some modern design techniques and features to future proof it and add variety to the environment in which it is sited. This is not only because such an approach should be expected of all residential developments in the twenty-first century but because Moreton-in-Marsh is a parish that has a rich heritage of quality residential development and wishes this tradition to be maintained.

2.4 Historic England's Planning White Paper (Planning for the Future, August 2020) includes a focus on incentivising design quality, through a greater role for design coding and design standards, encouraging and facilitating new development which is based on an understanding of each site's unique history, character and context, and thus creating distinctive new neighbourhoods. In the Moreton-In-Marsh Residents survey, 428 of the 473 respondents Strongly Agreed or Agreed with the statement that developments in the town should be 'of high quality design'.

2.5 The National Planning Policy Framework (NPPF) 2024. Chapter 12 (Paras 131 -141) concern 'Well Designed Places'. This emphasises the importance of setting clear expectations regarding design quality and refers to the role of design policies, design guidance, neighbourhood plans and frameworks such as Building for Life. Para 127 (c) states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

2.6 It has long been accepted that there is a direct link between housing and health, and wellbeing. The Healthy Urban Development Unit identify decent and adequate housing as being critically important to health and wellbeing and the NPPF (para 132 section f), highlights the importance of ensuring safe and healthy living conditions: specifically the recommendation is that developments "create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users".
Having access to good quality, suitable and secure housing has a profound impact on our health and wellbeing and, therefore, our quality of life. As summarised by Public Health England, "*the right home environment is critical to our health and wellbeing; good housing helps people stay healthy and provides a base from which to sustain a job, contribute to the community, and achieve a decent quality of life".*
The Academic Practitioner Partnership, in 'Good Housing, Better Health' (2016), places emphasis on Housing design and health. For example: 'internal layout and windows can provide good access to daylight which improves quality of life and reduces energy needed for lighting, and ventilation'. Good design can mitigate against potentially dangerous design features, such as stairs, uneven levels, or trip hazards.

2.7 'Happy by Design: A Guide to Architecture and Mental Wellbeing' (2019) explores the ways in which buildings, spaces and cities affect our moods. It reveals how architecture and design can make us happy and support mental health and explains how poor design can have the opposite effect. "We now spend more than 80% of our time in buildings, and this can affect our mood both positively and negatively. The quality of the places that we live, work and study therefore impacts (SIC) our happiness significantly".

2.8 The Building Better, Building Beautiful Commission was responsible for developing practical measures to ensure new housing developments meet the needs and expectations of communities, making them more likely to be welcomed, rather than resisted, by existing communities. The government welcomed their report ('Living with Beauty in 2020') and committed to implementing as many of the recommendations as possible.

2.9 Living with Beauty (2020), states that: 'beauty should be an essential condition for the grant of planning permission'. Further that: developments that 'violate the context in which they are placed' should NOT be permitted because: 'they destroy the sense of place and undermine the spirit of the community'.

The report also suggests that ‘Local Plans should give local force to this national requirement, defining it through empirical research, including surveying local views on objective criteria’. It recommends that housing ‘schemes should be turned down for being too ugly and such rejections should be publicised’.

2.10 Homes England is the national housing accelerator. ‘Building for a Healthy Life’ (2020) is Homes England’s key measure of design quality. The document stipulates that developers should aim to ‘create places that are memorable, with a locally inspired or otherwise distinctive character’. Developers should ‘review the wider area for sources of inspiration. If distinctive local characteristics exist, delve deeper than architectural style and details. Where the local context is poor or generic, **do not use** this as a justification for more of the same’.

Poor generic housing examples from Homes England Guidance include:





Images from ‘Homes England’ Guidance document.

2.11 Developers should aim to really understand the place where a new development is proposed and understand how any distinctive characteristics can be incorporated as features. For example, by using existing assets as anchor features, such as mature trees and other existing features. Positive characteristics such as street types, landscape character, urban grain, plot shapes and sizes, building forms and materials being used to reflect local character.

2.12 The Chartered Institution of Highways & Transportation states that the design, appearance and functionality of Streets and Roads (that make up three-quarters of all public space), ‘have a huge impact on the quality of people’s lives as well as economic and social vitality’.

The best developments are those created by small builders who are more responsive to local needs and work on a more intimate scale. Exemplars include: ‘Poundbury’ in Dorchester; ‘Borderville Farm’ Stamford, Lincolnshire; ‘Alderley Park’, Nether Alderley, Cheshire; ‘Park View’, Woodstock Oxfordshire; Lovedon Fields, Hampshire and Sealey Wood in Horsley

2.13 Developments that should be refused according to The National Planning Policy Framework (NPPF) 2024, Para 139, are those that do not meet the desired criteria. Specifically: “Development that is not ***well designed*** should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes”.

Conversely, “significant weight should be given to: a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings”

2.14 “Really beautiful villages are all made from the same material—stone in the Cotswolds, red brick in Essex—and there’s a lot of repetition. The trouble with the volume house builders is that they mix red brick, yellow brick, render, slate and weatherboarding in the same development, in an effort to create instant history—but that doesn’t fool anyone.” - architect Francis Terry, from Country Life: “Why most new-build housing in Britain is awful — and why it doesn’t have to be this way” by Clive Aslet August 4, 2021

THE DISTINCTIVE CHARACTER OF MORETON-IN-MARSH:

“We require from buildings two kinds of goodness: first, the doing their practical duty well: then that they be graceful and pleasing in doing it” John Ruskin

The National Model Design Code (2021), suggests that *local* design codes should exist to provide a set of simple, concise, illustrated design requirements that are visual and numerical wherever possible, to provide specific and detailed parameters for the physical development of a site or area, and that these should then be used as a toolkit to guide local planning authorities on the design parameters and issues that need to be considered and tailored to their **context.**

CONTEXT: EXAMPLES OF HISTORIC ASSETS:

The Redesdale Hall

The Centre of the High Street is dominated by the REDESDALE MARKET HALL, which stands on an island site and adds great distinction to the town. This excellent Victorian Tudor building was designed by Sir Ernest George in 1887, with mullioned and transomed windows with Tudor arched heads. The arcade has now been filled in. The steep-pitched roof is covered in Cotswold stone slates, and there is a nicely proportioned clock-turret and a tall castellated chimney

In 2019 Redesdale Hall was voted to be the best-loved building in Moreton-in-Marsh.

The Redesdale Hall is Grade II Listed , and was designed by notable British architect Sir Ernest George and built in 1887 by Sir Algernon Freeman-Mitford , the first Baron Redesdale and Lord of the Manor of Moreton-in-Marsh.

The original intention was that the hall be used ‘for the betterment of the local people.’



The Curfew Tower

Grade II Scheduled Monument.

The Curfew Tower is one of the oldest structures in the town, and it played an integral part in life here from the 16th century onwards. It fronts directly on to the medieval and post-medieval marketplace and is known to have acted as a lock up for local drunks and minor criminals for much of its history as there was no other provision for their confinement within the town. The monument includes a 16th century bell tower, known as the Curfew Tower, situated on the east side of the High Street on the corner of Oxford Street in the centre of Moreton-in-Marsh. The Curfew Tower comprises a stone structure with a stone slate roof and gabled turret and may be the oldest public building in the town. It has a four-centred arched stone doorway on the west side, above which is a smaller loft doorway, while in the south elevation is a very small round-headed window. The tower contains a bell and clock dated to 1633 and 1648 respectively. Next to the bell is a pulley wheel and there is a weathervane in the form of a cockerel above the bell.



The Mann Institute and Gardens

The Mann Institute was built built in 1891 of rusticated stone with a timber-framed gable-end by Miss Edith Mann, in memory of her father, Dr. John Mann (son of the first Congregational minister), as a working men's club. The institute was endowed by Miss Mann by will proved in 1902, and in 1903 a Scheme was drawn up for its administration by trustees including the rector and the Congregational minister. The site was conveyed to the trustees by Miss Elizabeth Mann in 1904. The Mann Institute included a hall, reading room, and recreation rooms and a flat for the use of women and children from the Canning Town Settlement (London) for holidays. In 1962 the Mann Institute was in use also as a men's club. Today it is Tyack's architectural practice.

The inscription on the plaque from Ruskin: 'Every noble life leaves the fibre of it interwoven for ever in the Work of the World.'



The War Memorial

Designed by Guy Dawber and unveiled in 1921 to commemorate the men of Batsford and Moreton-In-Marsh who died in the First World War. It was built from Hollington Stone from Derbyshire, and measures 24 feet tall on a flight of five steps.



Horse Pool / Duck Pond



Pond House

Built sometime between 1821 and 1885, on land formerly known as 'The Close' owned by Samuel Lardner. Two-storey double-fronted stone-built house with slate roof and four chimneys. Facade is symmetrical apart from the middle first-floor window which is off-centre. Doorway has pediment and three steps flanked by pillars. Five six-over-six sash windows.



WI Hall



Built in 1821 and converted in 1954. Originally a terrace of three or four one- and a-half storey cottages. Set back from the road behind what would have been front gardens. Built of stone with a stone tiled roof and coped gables. The unit with the projecting porch has two casement windows with segmental arches at ground floor level, and two first floor/dormer windows with flat lintels. The unit to its right has its own door and two casement windows with timber lintels, and no windows at first floor level.

St David's Church



Grade II listed (Listing Date: 30 June 1983)
Mostly rebuilt in 1858 by Poulton & Woodman of Reading (usually architects of Nonconformist and cemetery chapels). Nave of five bays, chancel, N and S aisles, S chapel, W tower in three stages with spire, and vestry. In 1790 the nave had been enlarged and the roof raised, but the rebuilding in 1858 was carried out in c13 and c14 styles. In 1860 the small c16 tower was demolished and a tower of golden ashlar built, with battlements, pinnacles, and an octagonal spire with gabled pointed lucarnes on four sides. In 1892 the chancel and S aisle were enlarged by E. H. Lingen Barker; the E end of the S aisle was first used as a chapel in 1927. The interior is limewashed, including the piers of the arcades. The chancel SCREEN is by Bligh Bond, erected in 1910. STAINED GLASS in the E window by Lavers & Westlake, 1858, and one window in the N aisle 1898 by Kempe. – Plate. Chalice and Paten cover, 1576. – In the churchyard iron GATES by John S. Scott, c 1960.

The church at Moreton-in-Marsh was originally a chapel of ease for Bourton-on-the-Hill, and the oldest part of the settlement was around the church. Later the town developed on the Fosse Way.

The St David's Centre



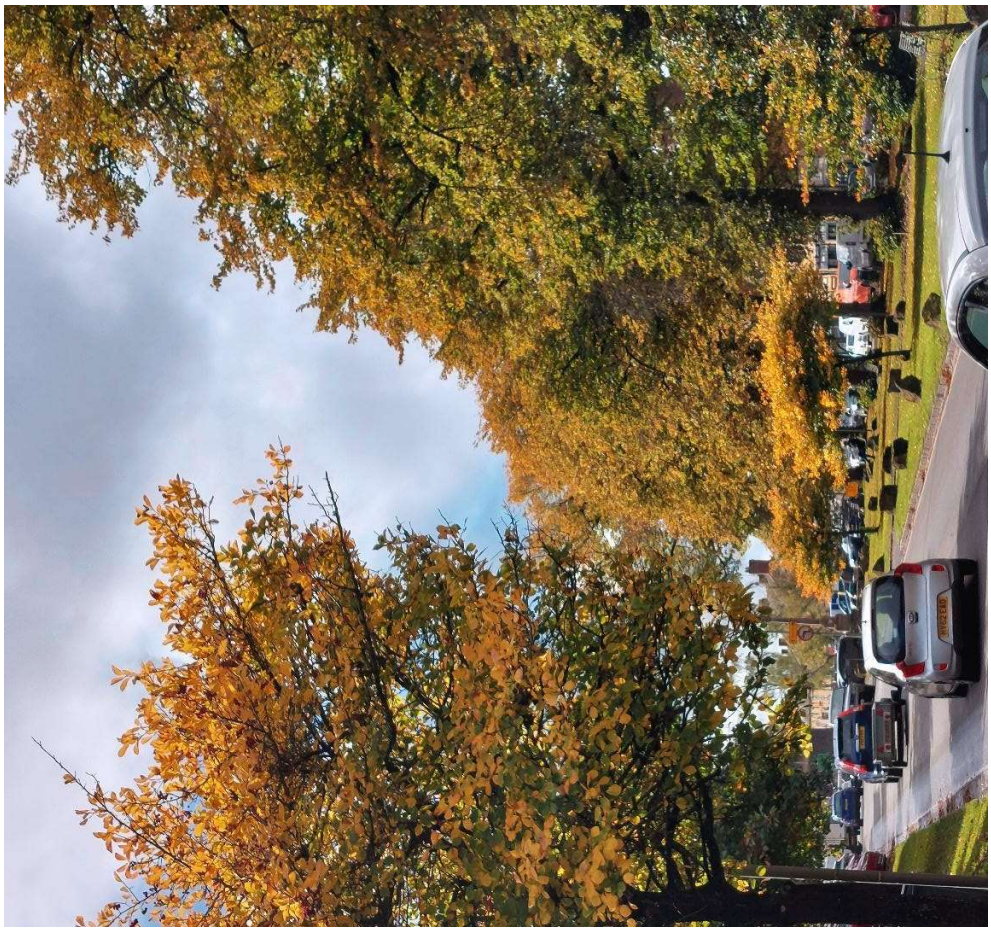
St David’s House

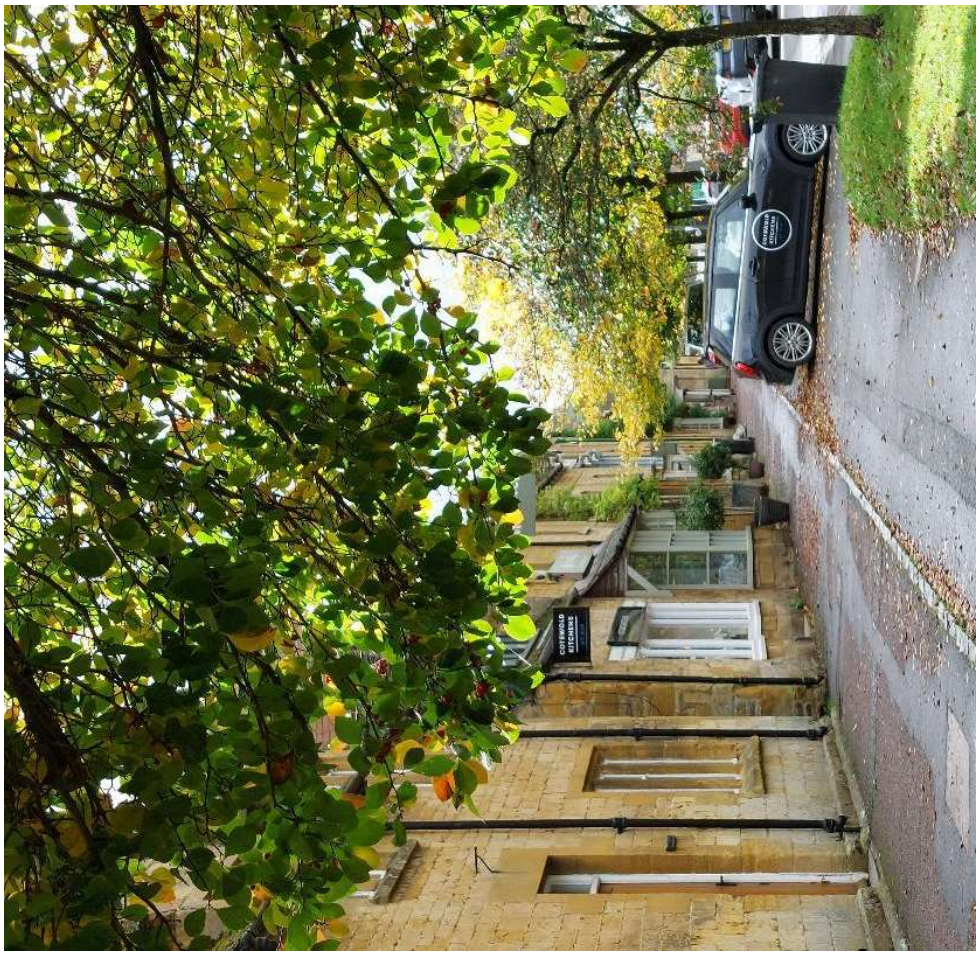
St. David's House, an 18th-century house, of two storeys with dormers, three windows with moulded stone architraves and triple keystones, and a door with a fanlight: pilasters to full height, in Church Street, stands in a row which includes a 17th-century house. It has a Cotswold stone roof with moulded stone eaves cornice, and stone pilasters.The house is close to St. David's Well which was considered to be a holy well and was used for curing sore eyes.



The High Street







The Old Police Station

The Old Police Station, High Street West. Built 1897. Two-storey stone-built building with stone tiled roof and two chimneys. Set back from road frontage behind low stone wall surmounted by iron railings. Central doorway and bay window to right at ground floor. Segmental arches above string course over doorway and window to left, and above first floor window to right. Closed 2011 and converted into two dwellings in 2012.



The Steps

The Palladian Town House from the mid-18th Century, is regarded as the most important house in Moreton. It sports some handsome neoclassical features such as semicircular windows, balustraded parapet and double flight of steps. Grade II listed.



Delabere House (formerly The Railway Inn), New Road

Built sometime between 1821 and 1878. Detached building facing New Street. Two storeys, built of stone with brick extension to rear. Facade: central doorway with sash window either side, substantial string course, and three sash windows at first floor level. East facing side elevation: a single sash window to each storey and ghost signs. West-facing side elevation has two windows at ground floor and two windows at first floor. Formerly The Railway Inn. By 1878 it was the meeting place of the Oddfellows Loyal Good Intent Lodge. The ghost signs are visible on historic photographs.



Lyes Cottage

Within Conservation Area. Built sometime between 1821 and 1885. Detached one-and a-half storey stone-built cottage, with later rear extension. Oriel window with decorative stonework at first floor level. Bargeboards of the three gables have modillions and a suspended finial.



Turnpike Lodge

Standing on the junction of the Fosseway and Batsford Road, this Tudor Gothic style lodge was built in the 19th Century.



Wellington Terrace

Built in 1860. Row of seven stone-built terraced houses adjoining Wellington House on its south side. Set back from Evenlode Road by small gardens defined by low stone walls with a wrought iron gate. Two storeys with attics. Slate roof with seven chimneys. Facade – each property has a doorway and a square window at ground, first and second floor level. All fenestration is UPVC and exhibits variation in style.



Devonshire Terrace

Built sometime between 1821 and 1885. Row of five terraced brick-built houses, directly fronting Hospital Road. Two storeys with attics. Slate roof with three brick chimneys. The facade bears traces of a painted sign (DEVONSHIRE TERRACE). Possibly associated with the Loyal Cotswold Lodge of the Oddfellows (two such terraces are recorded on Hospital Road but not named). Facade - doorways have Cotswold stone arch with tripartite fanlight; each property has a single six-over-six sash window with plain Cotswold stone lintel and cill at each floor level. Dormer windows to attics.



Alpha Terrace, Hospital Road

Built sometime between 1821 and 1885. Row of six terraced stone-built houses, directly fronting Hospital Road. Two storeys with attics. Slate roof and brick chimney to each property. The doorways on the facade have simple stone arches. Each property has a single two casement window at each floor level but all are replacements of originals.



Croft Terrace, Old Town

Built in 1908, by the Loyal Cotswold Lodge of the Oddfellows. Row of four terraced brick-built houses, set back from the road behind small front gardens. Two storeys with attics. Slate roof with four brick chimneys. The facade bears a plaque (CROFT TERRACE 1908). Each property has a doorway and a single tripartite window at ground floor level (two casements either side of fixed light), a two casement window at first floor level, and a two-casement dormer window to the attic. All of the windows have stone cills and segmental brick arches.



Croxdale Terrace, Evenlode Road

Built in 1899, by the Loyal Cotswold Lodge of the Oddfellows. Row of four terraced brick-built houses, set back slightly from the Evenlode Road frontage behind railings. Two storeys with attics. Slate roof with two brick chimneys. A central arched passageway between the two pairs provides access to the rear gardens; the arch is painted "CROXDALE TERRACE", with plaque placed above (GOOD INTENT LODGE MUIOOF 5749 1899 AD). The facade of each property has a doorway and single windows at ground and first floor level (three-casement UPVC) and a dormer window (two casement UPVC) to attic. Uniformity of doors and fenestration provides visual coherence, despite their being modern replacements



COMMUNITY ASPIRATIONS:

"When we build ... let it not be for present delights nor for present use alone. Let it be such work as our descendants will thank us for..." John Ruskin

The Community of Moreton-In-Marsh, want any new development to take the greatest care to include green spaces, safe footpaths, cycle paths and trees.

The Community feel strongly that the construction of all new developments should be planned to have the least disruptive impact on the neighbours of the development, its traffic, and its business community. There should be adequate consultation and constructive dialogue with all affected residents and businesses at the earliest possible stage, and this should continue until sites are fully developed and occupied.

As a result of the MIM NDP Initial Consultation event we know that Moreton residents have a desire for better walking routes, better connectivity of footpaths and cycleways and better lighting and signage, and more access to the countryside and wildlife areas.

The most popular descriptions of Moreton were "traditional market town" and "historic, busy, picturesque", with the historic buildings being the most popular feature, so these should act as a strong guide for all new developments.

The Redesdale Hall was cited as the most popular landmark feature, and Victoria Park was voted as being the most popular green space in Moreton. Therefore, conserving and enhancing these areas ought to be the starting point for the use of CIL monies as and when appropriate.

MORETON IN MARSH SPECIFIC GUIDANCE:

Moreton expects that all new developments should seek tenders from a variety of developers and should include **at least one** small builder/master planner with a proven track record of successful, innovative and architecturally interesting design.

Moreton would like planning and architectural design to be guided by the principle that ''pastiche is never successful'' (CDC Conservation Officer 2024) The critical line between thin pastiche and genuine invention rooted in past principle is rarely drawn.

All boundaries to new properties should be demarcated with either: native hedgerow plants, Cotswold stone walls, wooden fencing, or metal railings consistent with the historic nature of the town.

All boundaries to properties are to have hedgehog holes (1 ground 13cm hole every 3 metres)

Swift boxes should be installed where possible.

Dwellings should be grouped around garden squares, or courtyards with trees and grass to promote social cohesion and give children a safe place to play near to home.

Residential parking provision should be hidden from view e.g. behind homes in designated spaces ensuring that parking is not on the street obscuring front vistas, entrances and pavements. This is essential for safety of children at play, as well as access for emergency vehicles. This requirement also serves an aesthetic purpose, ensuring that developments and public areas achieve the desired 'beautiful' standard. If garages for parking are to be provided, these should be fully accessible and should be large enough to accommodate the average modern family car with its doors open.

Storage areas away from the front of properties should be included for all waste bins and recycling containers, ideally accessible to waste disposal personnel without the need to have these items placed on pavements or at the front of properties.

Renewable energy fundamentals should be integrated aesthetically into the design of properties, and not added ad hoc in an aesthetically incongruent way.

Planting in shared green spaces should be native British species only, and where possible reflect the indigenous planting of the North Cotswolds. Specifically, developers should avoid Leylandii, Cherry Laurel, and Eucalyptus.

Building materials used should reflect the current distinctive nature of the North Cotswolds and reflect the historic assets of the town to ensure a visual cohesion. Developers should also seek to balance this with the utilisation of modern 'design' and materials that complement our historic assets, not only for visual interest but to manage their obligations for sustainability and environmentally friendly buildings.

All properties should have access to outside space. A house should have a garden at least the size of the footprint of the house, and all flats should have a balcony space.

Where **nearby** allotments are not available, developers should allocate a proportion of the development area to be given over to allotments for residents of that development (allowing 1 allotment space (250m2) for every 10 dwellings),

Where allotments are not required developers should aim to include a community herb garden /orchard for the enjoyment of residents.

APPENDICES

APPENDIX 1

EXAMPLES OF DEVELOPMENTS THAT CONSTITUTE 'HIGH QUALITY DESIGN'

These examples put particular emphasis on the *quality of place*, making the buildings *unique and specific* rather than creating an homogenous 'nowhere' place lacking in soul or real identity. Architects here were committed to finding a good balance between the use of traditional local materials and building forms and embracing innovative and inspiring design choices.

'Sealey Wood', Horsley, Gloucestershire

LINK: https://edenstonehomes.com/past-developments/sealey-wood-horsley/

Tyack Architects, Individual Home, Blockley, Gloucestershire

LINK: https://www.tyackarchitects.com/housing/new-cotswold-stone-house%2C-blockley%2C-gloucestershire

'Park View', Woodstock, Oxfordshire

LINK: https://www.pyehomes.co.uk/developments/park-view/?gad_source=1&gad_campaignid=22766231758&gbraid=0AAAAA-mn9yMSRwtsZgVJXLrP7jYoKK43n&gclid=CjwKCAjw7fzDBhA7EiwAOqJkh-kR0Ft9vDbp8a_Mpsdjp-giK2c_sIlXwS383Hfu7mZJYcR4c-5GeBoCdY0QAvD_BwE

'Alderley Park', Nether Alderley, Cheshire

LINK: https://www.adamurbanism.com/project/alderley-park-cheshire/

'**Poundbury', Dorset**

LINK: https://poundbury.co.uk/about/history/

'Lovedon Fields', Hampshire

LINK: https://www.johnpardeyarchitects.com/modern-architecture/residential-architecture/lovedon-lane/

APPENDIX 2

EXAMPLES OF HOUSING DESIGN CONSIDERED UNSUITABLE FOR MORETON:

Antler Homes, Ashford Hill, Thatcham, Hampshire

https://www.antlerhomes.co.uk/developments_sites/kingfishers/?gad_source=1&gad_campaignid=20601068159&gbraid=0AAAAAChgt13IbKyRDYTZE_-m07UhBCYzM&gclid=CjwKCAjw7fzDBhA7EiwAOqJkh-rh2jPG90mAG2pmT8rnpgEfAC68ZY0vglPox-9MPY7cGznB9dFVJhoCLLsQAvD_BwE

Bamford Park, Wellesbourne, Warwickshire.

LINK: https://www.lindenhomes.co.uk/developments/warwickshire/bamford-park-lighthorne?infinity=ict2~net~gaw~cmp~22438733238~ag~184852182664~ar~746435864087~kw~property%20to%20buy%20wellesbourne~mt~p~acr~1826001059&&infinity=ict2~net~gaw~ar~746435864087~kw~property%20to%20buy%20wellesbourne~mt~p~cmp~22438733238~ag~184852182664&gad_source=1&gad_campaignid=22438733238&gbraid=0AAAADjcgEER9IgKQQYd8_KBGxX9GqHSj&gclid=CjwKCAjw7fzDBhA7EiwAOqJkh60XxDicLZwNK5l8ljeSUV-Y6qba98TDxSgUycQze6q9ifhzwEWB4RoC5RcQAvD_BwE

The Asps, Warwick, Warwickshire:

LINK: https://www.taylorwimpey.co.uk/new-homes/warwick/the-asps

New Lubbesthorpe, Birmingham

LINK: https://www.dwh.co.uk/new-homes/dev000784-new-lubbesthorpe/

Hunts Grove Gloucester

LINK: https://www.crestnicholson.com/developments/gloucestershire/hunts-grove?infinity=ict2~net~gaw~cmp~CN%20%7C%20South%20West%20%7C%20Hunts%20Grove%20%7C%20Search~ag~Gloucester~ar~698203237323~kw~new%20houses%20for%20sale%20gloucester~mt~p&gad_source=1&gad_campaignid=21244355928&gbraid=0AAAAACmEl7jEfu-AwZZO3qAFttoJEXP75&gclid=CjwKCAjw7fzDBhA7EiwAOqJkh17pT8x8kzk0_btNiaNvtSpsl9QrsLWRphtQ0NX_wh_q8NgJqkjr4RoCvmwQAvD_BwE

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The National Model Design Code (2021)

Living with Beauty (2020, The Building Better, Building Beautiful Commission)

Building in Context: Building for a Healthy Life (2020)

Manual for Streets (2010)

The Chartered Institution of Highways & Transportation website

Healthy Urban Development Unit, Rapid Health Impact Assessment Tool, 4th Edition

Happy by Design: A Guide to Architecture and Mental Wellbeing (2019)

Housing Audit, Assessing the Quality of New Homes, London, the South East and the East of England (CABE, 2004);

Housing Audit. Assessing the Design Quality of New Homes in the North East, North West and Yorkshire and Humber (CABE, 2005)

Francis Terry, Country Life: Why is most new-build housing in Britain is awful — and why it doesn't have to be this way by Clive Aslet August 4, 2021

"The Buildings of England – Gloucestershire: The Cotswolds" by David Verey Edited by Nikolaus Pevsner. (2002)

https://www.architectural-review.com/archive/principle-v-pastiche-perspectives-on-some-recent-classicisms

https://hdawards.org/

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'Historic Assets' Information courtesy of Elizabeth Pratt

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Appendix B

Policy 14

Infrastructure Investment Priorities



These aspirations are taken from the interactions with the community.

1. A Thriving High Street (including a traffic flow improvement plan)

   To continue having Moreton-in-Marsh as a thriving, beautiful and unique Cotswold market town means making the High Street a safer and more pleasant place for people to spend time and money. High Street Refurbishment improvements include:

   a. Pedestrianisation of parts of the High Street
   b. Improvements to the 'Market Square'
      - planting, removal of some parking, outdoor seating, sculpture garden (local artists)
   c. Planning and better management of tree gardens and greens,
   d. Improved traffic management system
      i. a one way traffic system,
      ii. narrowing of sections of the high street to reduce speeds and sizes of vehicles and allow people to cross the High Street more safely
      iii. speed humps and speed cameras
      iv. CC TV to monitor and enforce correct use of parking bays (particularly the 'coaches only' area)
   e. altered parking provision (to divert vehicles to the new Transport Hub)
   f. More pedestrian crossing points – e.g. by the Co-op and the library
   g. More outdoor seating

2. Transport Hub:
   a. To remove long-stay parking from the town centre (and returning the High Street space back to pedestrians) to a location close to the train and bus stations.

3. Redesdale Hall

   Refurbishment including Public Realm improvements around the Hall.

   The hall is a major building in the centre of the town dating from the late 19th century which is important to residents as it hosts many community and social events. It now requires considerable repairs, refurbishment and enhancements to enable it to continue its role for the community into the 21st century.

4. Make Moreton Accessible:
   a. Wide pedestrian path along the Fosseway connecting the town to the hospital and the garden centre.
   b. Improved public transport provision – direct and regular community bus service connecting small villages (such as Longborough, Batsford, Blockley and Dorn) to the High Street and thereby preventing the use of cars.
   c. Bus Shelters (aesthetically appropriate) on **both** sides of the High Street – rather than by the Redesdale Hall where there are often cars parked making it dangerous for children and elderly people disembarking.
   d. Town wide cycle lanes to allow for a fully connected parish without the need for cars.

5. Enhance Biodiversity
   Invest in planting around the town such as a community orchard, additional woodland or a herb garden

6. Additional Retail
   Although the focus of the main retail provision is on the High Street, there may be opportunities for small, local shops close to the new developments on the east side of the town.

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Appendix C

Policy 15

Local Green Space Proposal



LGS Ref	Map	Name and Address
1	SE	Moreton Rangers FC
2	SE	Outdoor gym, etc
3 (a)	NE	Blenheim Meadow
3 (b)	NE	Cotswold Gate open space
3 (c)	NE	Moreton Park / Cotswold Gate
4	NE	Land east of Moreton Park
5	Own Map	Entrance to Fire Service College
6	SE	Upper Cemetery
7	NW	Lower Cemetery
8	SE	University allotments
9	NW	Hospital Road allotments
10	SE	Croft Road allotments
11	SE	St David's churchyard
12	SE	Tinkers Close playground
13(a)	SW	Redesdale Place MUGA
13 (b)	SW	Redesdale Place Croquet club
13 (c)	SW	Redesdale Place Bowls club
14	SW	Monarch Way Grassed strip
15 (a)	SW	Jubilee Gardens
15 (b)	SW	Jubilee Gardens opposite verge
16 (a) - (f)	NW	Greens on High St
17	NW	QVG
18	NW	Mann Institute Gardens
19	NW	Glebe Field
20	SE	Special habitat – Stockwells
21(a)	NE	Moreton Park - 1
21(b)	NE	Moreton Park – 2
21(c)	NE	Moreton Park - 3

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Appendix D

Policy 16

Non-Designated Heritage Assets



COMPLETE LIST OF HERITAGE BUILDINGS, LISTED BUILDINGS AND SIGNIFICANT LANDMARKS

Pillbox, Todenham Road

Blenheim Farm outbuildings,

The Old Curiosity Shop, Corders Lane

New Cottage and attached, Corders Lane

The Jessamine, Hospital Road

Garden Hurst, Hospital Road

Flower House, Hospital Road

Fosse Barn, High Street

Converted farm buildings of Bowling Green Court,

Hospital Road Barn of Meadow House, Hospital Road

Veterinary Surgery, Hospital Road

Three Ways, Bourton Road

The Rectory & Moreton Lodge

The Inn on the Marsh, Stow Road

New Road Cotswold Carpets,

New Road Launderette,

New Road Post Office,

New Road Sunset,

New Road Acacia B&B,

New Road Grafton House,

New Road Milton House,

Oxford Street North The Manse (Organic Hair Company),

Oxford Street North Star Cottage,

Oxford Street South Peony Cottage (North View),

Oxford Street South Corner Cottage,

Oxford Street South Arthur's Cottage,

East Street Little Cottage with Mellow Stone Cottage,

East Street Mitford Villas,

London Road 1–7

London Road Ivy Lodge

Charlton Villa, Evenlode Road

Railway Station Building Built 1872–73.



Signal Box Built by 1885, probably in the 1870s.



Mortuary Chapel, (Bier House) Church of England Cemetery, London Road (West)



Coldicote Farm, Evenlode Road Farmhouse



Cider Press, Fosseway Avenue



Pond House Parkers Lane Built sometime between 1821 and 1885.



The Horsepool – Parkers Lane & Stowe Rd



Appendix E

IMPORTANT VIEWS

30/11/25

View #1 Monarch's Way – Batsford path towards Redesdale Hall and St David's church



Grid Ref: SP 201 324
Direction: 111^0 (ESE)

Reason view is important:

View for walkers of the entrance into town from the Cotswold National Landscape on a well used public footpath, The Batsford Path (part of the Monarch's Way. From this path the Redesdale Hall clock tower, St. David's church and the Hospital Road allotments can all be seen.

View #2 A44 from Evesham entrance to town opposite Wellington Museum



Grid Ref: SP 202 322
Direction: 81° (E)

Reason view is important:

In close proximity to the town centre, yet still in the Cotswold National Landscape, the main A road is tree lined with green verges providing a semi-rural feel. Jubilee Gardens (celebrating the Festival of Britain) are on the right.

View #3 Diamond Way footpath (HMM15) looking along River Evenlode



Grid Ref : SP 212 314
Direction : 345° (NNW)

Reason view is important:

In the Special Landscape Area and near the source of the River Evenlode as seen from footpath HMM15. A typical marshland before much of the land was drained and acts as a reminder of how things were. A bountiful habitat to observe flora and fauna which can be observed from the footpath.

View #4 North West of Coldicote Farm along footpath HMM11



Grid Ref : SP 214 311
Direction : 320° (NW)

Reason view is important:

Within the Special Landscape Area, this is the only time footpath HMM11, which links Moreton to Evenlode, follows the river Evenlode, albeit in its infancy. With water meadows and willows to the west and commercial farmland to the east, it's thought provoking. This is part of a popular circular route from Moreton which links up to the Diamond Way

View #5(a) From Evenlode Road (National Cycle Route 48) looking along footpath HMM15



Grid Ref : SP 214 315
Direction : 259° (W)

Reason view is important:

From Cycle Route 48, along footpath HMM15 which forms part of the Moreton 8 walk, the view looks west across the Special Landscape Area bordering the southern perimeter of Moreton and stretches across to the Cotswold National Landscape in the distance, in which the Batsford and Sezincote houses and estates nestle.

View #5(b) Close up from same point as 5(a) looking North West towards the town



Grid Ref : SP 215 315
Direction : 312° (NW)

Reason view is important:

Looking north west from the same point on the footpath as 5(a) showing the proximity of the town to its rural environment, with the Special Landscape Area in the foreground and the Cotswold National Landscape and Batsford Arboretum in the background. The iconic buildings of St David's church and Batsford House can easily be picked out.

View #6 Diamond Way footpath looking towards Fosseway (Footpath HLO18)



Grid Ref : SP 209 313
Direction : 337° (NNW)

Reason view is important:

As Moreton is approached from the south, along the route shared by the Diamond Way and Moreton 8, the open arable farmland, part of the Special Landscape Area, is bordered by natural hedgerows, and an old corrugated barn in the corner of the field. There is little that indicates it is within 700m of entering Fosseway Avenue.

View #7 Croft Allotments towards St David's church



Grid Ref : SP 212 321
Direction : 300° (WNW)

Reason view is important:

The view across the allotments and the Special Landscape Area, which link the countryside to the town, looks towards St. David's church in the centre of the town and across to the Cotswold National Landscape.

View #8 View from London Road bridge across Blenheim Meadows



Grid Ref : SP 208 325
Direction : 35° (NE)

Reason view is important:

This view across open meadow land is taken from just before the railway bridge in the heart of the town on the A44. The view benefits from the trees which are part of the Queen's Canopy and additional planting which is part of the Wild Towns initiative.

View #9 A44 from Chipping Norton on London Rd Bridge towards St David's



Grid Ref : SP 207 324
Direction : 200^{0} (SSW)

Reason view is important:

This view, which is in the Cotswold National Landscape, is taken from the other side of the road to view #8 on the approach to the railway bridge in the heart of the town. It looks towards the church across the playing fields of St. David's school which are an important part of the school facilities.

View #10 High Street (SSW)



Grid Ref : SP 205 327
Direction : 193° (S)

Reason view is important:

Within the Cotswold National Landscape, Moreton's tree-lined High Street is the second widest in the country and it's trees and greens provide a beautiful introduction to the town when entering from the north. The lime trees are unusual in that they are unpollarded and provide shade for residents and visitors in centre of the town. The origins of the High Street date from the original 1880's master plan (including the Redesdale Hall).

View #11 High Street Greens (N) from Stow side of Redesdale Hall



Grid Ref : SP 204 322
Direction : 7° (N)

Reason view is important:

Within the Cotswold National Landscape, the important southern entrance to the town is within the conservation area and is lined with historic buildings including coaching inns and the Redesdale Hall, the main community building in the town.

View #12 View of the Avenue of Trees in Queen Victoria Gardens



Grid Ref : SP 204 329
Direction : 180° (SE)

Reason view is important:

Within the Cotswold National Landscape, this classic lime tree walkway in Queen Victoria Gardens provides a stately environment for the footpath which is part of the Diamond Way and passes by the ancient settlement at the edge of the park.

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Moreton-in-Marsh Neighbourhood Plan

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Basic Conditions Statement



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1. Introduction

This Basic Conditions Statement has been produced to accompany the Moreton-in-Marsh Neighbourhood Plan (referred to as 'the Plan') to its submission to the local planning authority, Cotswold Council, under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the Regulations').

Paragraph 8(2) of Schedule 4B to the 1990 Town & Country Planning Act (TCPA) requires that a Neighbourhood Plan (or order) will be considered to have met the seven basic conditions if:

a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
d) the making of the order contributes to the achievement of sustainable development,
e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and
g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

Basic Conditions (b) and (c) relate to neighbourhood development orders therefore are not relevant to the consideration of whether the MORETON-IN-MARSH NEIGHBOURHOOD PLAN meets the basic conditions.

2. Supporting documents and evidence

The Moreton-in-Marsh Neighbourhood Plan is supported by a Consultation Statement and this Basic Conditions Statement.

3. Key statements

Moreton-in-Marsh Town Council is a qualifying body and entitled to submit a Neighbourhood Plan for its own parish. The Moreton-in-Marsh Neighbourhood Plan expresses policies that relate to the development and use of land only within the neighbourhood area.

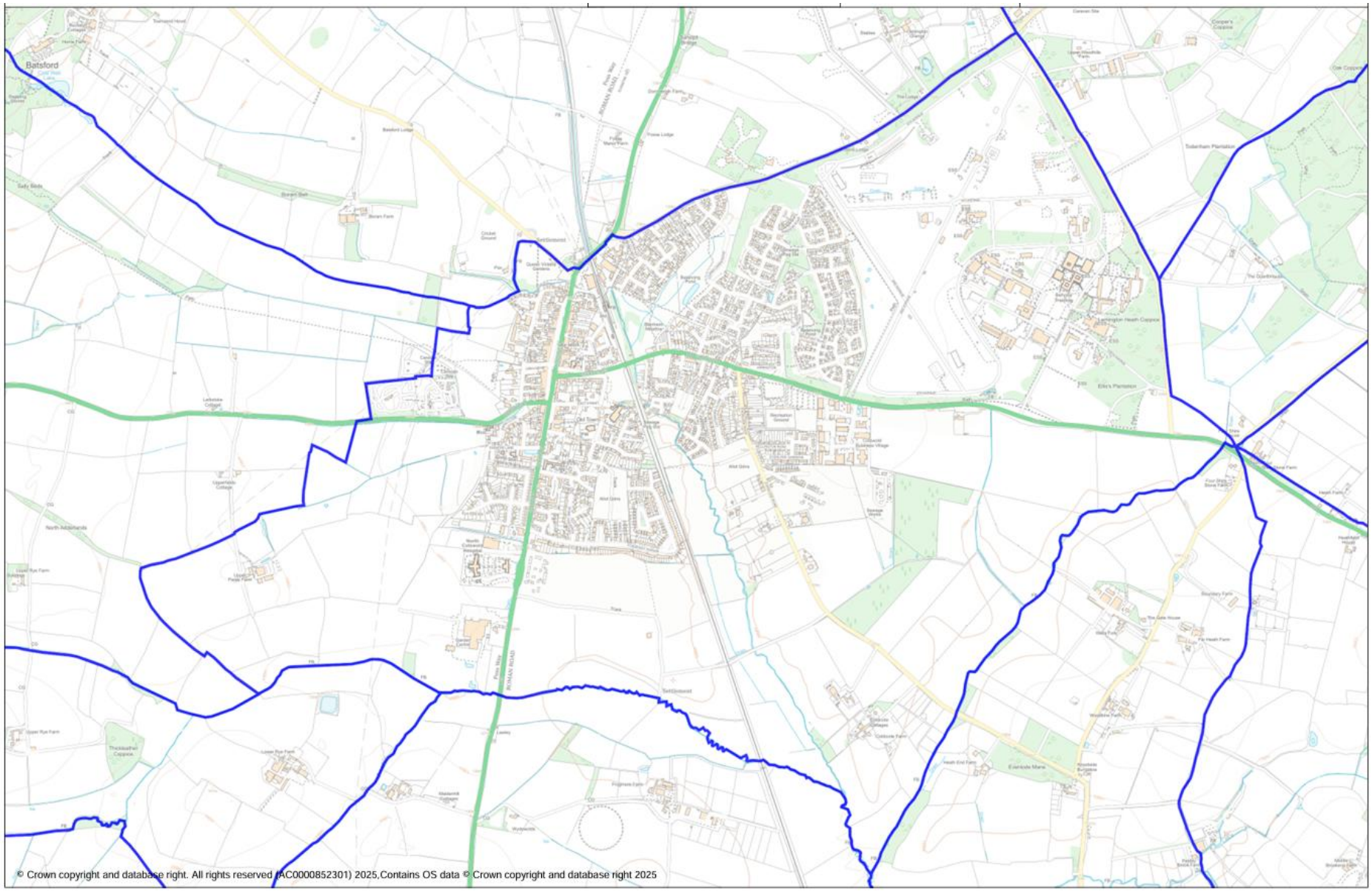
The neighbourhood area is contiguous with the parish boundary, as shown in the map on the following page.

The Moreton-in-Marsh Neighbourhood Plan covers the period from 2018 to 2031.

No provision for excluded development such as national infrastructure is contained within the Neighbourhood Plan.

The Moreton-in-Marsh Neighbourhood Plan does not relate to more than one neighbourhood area. It is solely related to the area of Moreton-in-Marsh as designated by Cotswold District Council in September 2018 (see map) which is contiguous with the Parish Boundary.

There are no other Neighbourhood Development Plans in place for the Moreton-in-Marsh neighbourhood area.


Batsford
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4. Conformity with national planning policy

Introduction

It is required that the Moreton-in-Marsh Neighbourhood Plan has appropriate regard to national planning policy and advice contained in guidance issued by the Secretary of State. National policy and guidance is contained within the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

National Planning Policy Framework[1]

The NPPF in sections 29-31 and 38 refers to Neighbourhood Development Plans and seeks that those plans have regard to the policies in the NPPF and to be in 'general conformity' with the strategic policies of the Local Plan. This phrasing is explained more clearly by the Localism Act which refers to the 'adopted Development Plan'.

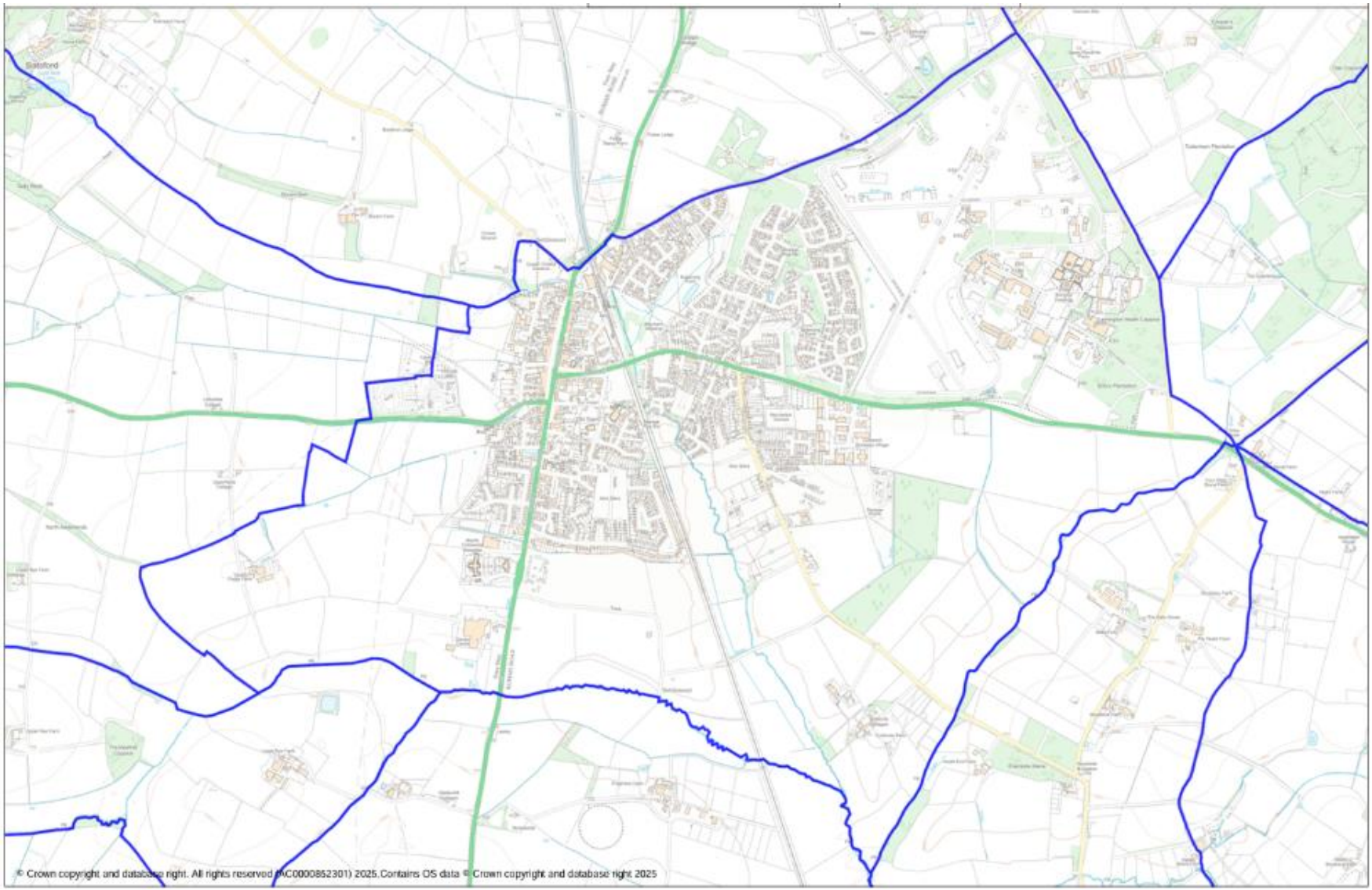
This section demonstrates that, of the 13 key objectives within the NPPF, the Moreton-in-Marsh Neighbourhood Plan has policies that meet 10 of these, specifically in relation to:

- Delivering a sufficient supply of homes
- Building a strong, competitive economy
- Ensuring the vitality of town centres
- Promoting healthy and safe communities
- Promoting sustainable transport
- Making effective use of land
- Achieving well-designed places
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Conserving and enhancing the historic environment

The Moreton-in-Marsh Neighbourhood Plan has 16 principal objectives. We list them in table 2.1 below and which NPPF goals each objective seeks to address.

Table 2.2 then provides a summary of how each policy in the Moreton-in-Marsh Neighbourhood Plan conforms specifically to the NPPF.

[1] National Planning Policy Framework December 2024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Ref	Objective	NPPF Goal
1	New developments to be energy efficient and climate adaptive	▪ Achieving well-designed places ▪ Meeting the challenge of climate change, flooding and coastal change
2	New developments to provide a range of housing to meet the needs of local people	▪ Delivering a sufficient supply of homes ▪ Achieving well-designed places
3	New developments on brownfield sites to take priority over greenfield sites	▪ Delivering a sufficient supply of homes ▪ Achieving well-designed places
4	To ensure new homes are of high-quality design and built to Building Research Establishment Environmental Assessment Method (BREEAM) standards	▪ Achieving well-designed places ▪ Meeting the challenge of climate change, flooding and coastal change
5	Ensure appropriate infrastructure is in place to support new development prior to completion of the project.	▪ Achieving well-designed places ▪ Meeting the challenge of climate change, flooding and coastal change
6	To support the provision of principle residence housing for those wishing to live in Moreton in Marsh	▪ Delivering a sufficient supply of homes ▪ Building a strong, competitive economy
7	New developments to facilitate and support the growth of the business base within Moreton-in-Marsh, creating more jobs across a diverse range of sectors	▪ Building a strong, competitive economy ▪ Ensuring the vitality of town centres
8	Support development of small business units/shared space	▪ Building a strong, competitive economy ▪ Ensuring the vitality of town centres
9	New developments to support and sustain a vibrant attractive and successful town centre that meets the needs of the local community and visitors	▪ Building a strong, competitive economy ▪ Ensuring the vitality of town centres ▪ Promoting healthy and safe communities ▪ Achieving well-designed places
10	Improve the public realm and traffic management within and through the town to provide easier, safer and more pleasant access for residents and visitors, using developer contributions	▪ Building a strong, competitive economy ▪ Ensuring the vitality of town centres ▪ Promoting healthy and safe communities ▪ Achieving well-designed places ▪ Promoting sustainable transport
11	Protect and maintain open green spaces	▪ Conserving and enhancing the natural environment ▪ Promoting healthy and safe communities

12	Protect and maintain archaeological and built heritage assets deemed to be of value to the community	▪ Conserving and enhancing the historic environment
13	Preserve and increase opportunities for biodiversity net-gain	▪ Conserving and enhancing the natural environment ▪ Promoting healthy and safe communities
14	Preserve important views within the parish	▪ Conserving and enhancing the natural environment ▪ Promoting healthy and safe communities
15	Protect the sensitive natural environment and exceptional rural assets surrounding Moreton-in-Marsh	▪ Conserving and enhancing the natural environment ▪ Promoting healthy and safe communities
16	Create a more connected parish for residents and visitors alike, limiting the need for vehicular travel within the town and offering a genuine choice of transport options to help reduce congestion and emissions, to improve air quality and public health	▪ Promoting healthy and safe communities ▪ Promoting sustainable transport

Table 2.2: Assessment of how each policy in the Moreton-in-Marsh Neighbourhood Plan conforms to the NPPF

No.	Policy title and reference	NPPF ref. (para.)	Commentary
1	**Climate Adaption and Energy Efficiency in Developments**	161, 162, 164, 167	Seeks to encourage the use of renewable energy in homes and transportation.
2	**Managing Flood Risk**	161, 162, 170-8, 181	Seeks to mitigate issues caused by surface water flooding and minimise impacts of development on water quality
3	**Housing Mix**	63	The policy contributes to the NPPF objective of delivering a sufficient supply of homes by requiring the mix of housing development to reflect local need.
4	**Affordable Housing**	63, 64, 66	The policy contributes to the NPPF objective of delivering a sufficient supply of homes by requiring the mix of housing development to reflect local need.
5	**Well-designed housing and Places**	29, 125, 131, 132, 134, 135	The policy contributes to the NPPF objectives of achieving well designed places, promoting sustainable transport and meeting the challenge of climate change, flooding and coastal change. It does this by requiring development to reflect townscape character, provide good walking and cycling connections and cycle storage and be water efficient and meet the highest possible standards of construction.
6	**Parking in Residential Developments**	109, 112, 115	This policy contributes to the NPPF objective of promoting sustainable transport by seeking to ensure new residential developments provide appropriate levels of parking facilities.
7	**Brownfield first**	124, 125, 126	This policy contributes to the NPPF objective of making effective use of land by directing development towards the built-up area of Moreton-in-Marsh. This allows for further growth in the town on infill or brownfield sites.
8	**Hard Infrastructure**	11, 29, 35, 40, 109	Seeks to ensure the necessary infrastructure and utility provision is considered and provided in full to support new developments.
9	**Soft Infrastructure**	11, 16, 29, 35, 40, 98	Seeks to ensure the necessary infrastructure and utility provision is considered and provided in full to support new developments.
10	**Principal residence housing**	66, 82	The policy contributes to the NPPF objective of delivering a sufficient supply of homes to reflect local need.

No.	Policy title and reference	NPPF ref. (para.)	Commentary
11	**Employment Land**	85, 111, 128	Seeks to sustain a vibrant attractive and successful town that meets the needs of the local community and visitors
12	**Small Business Units**	88, 111, 128	Seeks to support the creation of new businesses serving local needs where these are otherwise not available and where they are easily accessible to the whole community
13	**Retail Provision**	85, 88, 89, 90	The policy contributes to the NPPF objectives of building a strong, competitive economy and securing the vitality of town centres by seeking to protect existing retail units from being lost to alternative uses.
14	**Infrastructure Investment Priorities**	35, 96	Seeks to improve access to key facilities within Moreton-in-Marsh and ensure the necessary infrastructure is delivered to ensure that non-car users have alternative routes to the existing road network.
15	**Local Green Spaces**	106, 107, 108	Designates a series of spaces that are special to the community and fulfil the NPPF criteria.
16	**Conserving non-designated heritage assets**	29, 207, 208, 216	This policy contributes to the NPPF objective of conserving and enhancing the historic environment by identifying and seeking to protect treasured historic assets within Moreton-in-Marsh.
17	**Enhancing Biodiversity**	29, 187, 192	This policy contributes to the NPPF objective of conserving and enhancing the natural environment by seeking to preserve the natural features of Moreton-in-Marsh.
18	**Important views**	187, 189, 190	The policy identifies Important Local Views that are special in recognising the intrinsic character and beauty of the countryside form, but is not prescriptive about design solutions. The policy therefore requires development proposals to avoid unnecessary harm by way of their height, massing or obtrusive location.
19	**Development Boundary**	129, 132	This policy contributes to the NPPF objective of conserving and enhancing the natural environment by seeking to prevent settlement spread and maintain the identity of Moreton-in-Marsh.
20	**Transport & Active Travel**	109, 110, 117, 118,	This policy seeks to enhance opportunities for active travel and reduce reliance on private car use.

5. Contribution towards sustainable development

The NPPF states in paragraph 11 that 'at the heart of the Framework is a presumption in favour of sustainable development'.

Table 3.1 below summarises how the objectives and policies in the Moreton-in-Marsh Neighbourhood Plan contribute towards sustainable development, as defined in the NPPF.

Table 3.1: Assessment of Moreton-in-Marsh Neighbourhood Plan objectives and policies against sustainable development

Deliver Economic Sustainability	
NPPF Definition – "to help build a strong, responsive and competitive economy"	
Moreton-in-Marsh Neighbourhood Plan Objectives	○ New developments to facilitate and support the growth of the business base within Moreton-in-Marsh, creating more jobs across a diverse range of sectors ○ Support development of small business units/shared space ○ New developments to support and sustain a vibrant attractive and successful town centre that meets the needs of the local community and visitors ○ Improve the public realm and traffic management within and through the town to provide easier, safer and more pleasant access for residents and visitors, using developer contributions ○ Create a more connected parish for residents and visitors alike, limiting the need for vehicular travel within the town and offering a genuine choice of transport options to help reduce congestion and emissions, to improve air quality and public health
Moreton-in-Marsh Neighbourhood Plan Policies	**Policy 7: Brownfield land** **Policy 11: Employment Land** **Policy 12: Small Business Units** **Policy 13: Retail Provision** **Policy 14: Infrastructure Investment Priorities** **Policy 20: Transport & Active Travel**

Deliver Social Sustainability	
NPPF Definition – "to support strong, vibrant and healthy communities"	
Moreton-in-Marsh Neighbourhood Plan Objectives	○ New developments to provide a range of housing to meet the needs of local people ○ To support the provision of principle residence housing for those wishing to live in Moreton in Marsh ○ To allocate a site for future development in Moreton-in-Marsh to meet the identified needs of the community. ○ New developments to facilitate and support the growth of the business base within Moreton-in-Marsh, creating more jobs across a diverse range of sectors ○ Support development of small business units/shared space ○ New developments to support and sustain a vibrant attractive and successful town centre that meets the needs of the local community and visitors ○ Improve the public realm and traffic management within and through the town to provide easier, safer and more pleasant access for residents and visitors, using developer contributions

	○ Create a more connected parish for residents and visitors alike, limiting the need for vehicular travel within the town and offering a genuine choice of transport options to help reduce congestion and emissions, to improve air quality and public health
Moreton-in-Marsh Neighbourhood Plan Policies	**Policy 3: Housing mix** **Policy 4: Affordable Housing** **Policy 5: well-designed housing and Places** **Policy 6: Parking in Residential Developments** **Policy 10: Principal Residence Housing** **Policy 14: Infrastructure Investment Priorities** **Policy 15: Local Green Space** **Policy 20: Transport & Active Travel**

Deliver Environmental Sustainability	
NPPF Definition – "to protect and enhance our natural, built and historic environment; and adapting to climate change"	
Moreton-in-Marsh Neighbourhood Plan Objectives	○ New developments to be energy efficient and adaptive to climate change ○ New developments on brownfield sites to take priority over greenfield sites ○ To ensure new homes are of high-quality design and built to Building Research Establishment Environmental Assessment Method (BREEAM) standards ○ Ensure appropriate infrastructure is in place to support new development prior to completion of the project. ○ Protect and maintain open green spaces ○ Protect and maintain archaeological and built heritage assets deemed to be of value to the community ○ Preserve and increase opportunities for biodiversity net-gain ○ Preserve important views within the parish ○ Protect the sensitive natural environment and exceptional rural assets surrounding Moreton-in-Marsh ○ Create a more connected parish for residents and visitors alike, limiting the need for vehicular travel within the town and offering a genuine choice of transport options to help reduce congestion and emissions, to improve air quality and public health
Moreton-in-Marsh Neighbourhood Plan Policies	**Policy 1: Climate Adaption and Energy Efficiency in Developments** **Policy 2: Managing Flood Risk** **Policy 7: Brownfield First** **Policy 8: Hard Infrastructure** **Policy 9: Soft Infrastructure** **Policy 15: Local Green Space** **Policy 16: Conserving non-designated heritage assets** **Policy 17: Enhancing Biodiversity** **Policy 18: Important views** **Policy 19: Development Boundary** **Policy 20: Transport & Active Travel**

6. General conformity with the strategic policies of the development plan

The development plan covering the Neighbourhood Plan Area currently consists of the following:

- Cotswold District Council Local Plan 2011-2031, adopted Aug 2013
- Gloucestershire County Council Local Development Guide July 2025
- Gloucestershire Minerals Local Plan adopted 2021

The policies of relevance are shown in Table 4.1 below, along with a consideration of whether they represent the strategic policies of the development plan. Where they do, consideration is made of whether the Moreton-in-Marsh Neighbourhood Plan is in general conformity with them.

Any policy that is not identified in Table 4.1 is not considered to be relevant to the Moreton-in-Marsh Neighbourhood Plan because the Moreton-in-Marsh Neighbourhood Plan does not have any policies that directly relate to it.

Neighbourhood Plan Policy	Development Plan Policy	Commentary
Climate Adaption and Energy Efficiency in Developments		There is no adopted strategic policy on this matter, but this policy is consistent with the Local Plan objectives of ensuring new development is of a sustainable design and maximises energy efficiency and with the broader climate change ambitions of the District Council.
Managing Flood Risk	Policy EN14 Managing Flood Risk Policy INF8 Water Management Infrastructure Policy SA3 Strategic Delivery-North Cotswolds	This policy restates and builds upon the provisions of EN14 and INF8 on flood risk in order to draw attention to the importance of this issue and its complexities in Moreton-in-Marsh, as highlighted by Policy SA3.
Housing Mix	Policy H1 Housing Mix & tenure to Meet Local Need	The policy refines H1(1) by encouraging proposals to give an emphasis to the delivery of small and medium sized family homes and to deliver homes that are especially suited or adaptable to meeting the needs of older households. The evidence base indicates that these are of particular relevance to Moreton-in-Marsh as it continues to grow and its population ages.
Affordable Housing	Policy H1 Housing Mix & tenure to Meet Local Need Policy H2 Affordable Housing	This policy aligns with Local Plan policy H2 by setting out how affordable homes should be integrated into new developments.
Well-designed Housing and Places	Policy INF7 Green Infrastructure Policy EN2 Design of the Built & Natural Environment	The policy contributes to Policy EN2 of achieving well designed places, promoting sustainable transport and meeting the challenge of climate change, flooding and coastal change. It does this by requiring development to reflect townscape character, provide good walking and cycling connections and cycle storage and be water efficient and meet the highest possible standards of construction. In addition, the policy supplements INF5 by requiring EV charging infrastructure in new car parking arrangements, again to reflect the town's relatively remote location from larger centres of population where such charging infrastructure is more commonplace.
Parking in Residential Developments	Policy INF5 Parking Provision	This policy contributes to INF5 by seeking to ensure new residential developments provide appropriate levels of parking facilities and encourage sustainable travel routes to the Town Centre.
Brownfield first	Policy EN1 Built, Natural & Historic Environment	This policy contributes to the NPPF objective of making effective use of land by directing development towards the built-up area of Moreton-in-Marsh. This allows for further growth in the town on infill or brownfield sites.

Neighbourhood Plan Policy	Development Plan Policy	Commentary
Hard Infrastructure	Policy INF8 Water Management Infrastructure Policy SA3 Strategic Delivery-North Cotswolds Policy INF1 Infrastructure Delivery	The policy restates and bolsters the provisions of INF1 and INF8 to address past weaknesses in the timeliness and quality of supporting infrastructure as the town continues to grow. It is vital that developers work with the utilities companies at the earliest stages of designing their proposals to ensure that those proposals include details to address these matters in relation to their nature, scale and location.
Soft Infrastructure	Policy INF7 Green Infrastructure Policy INF2 Social & Community Infrastructure	The policy builds on INF2 to support soft infrastructure as the town and community continues to grow.
Principal residence housing		There is no policy in the Local Plan relating to Principal Residence. However, the evidence base clearly identifies a need to address the adverse effect that the high proportion of second homes in the neighbourhood area has on access to market and affordable homes. As such, the policy seeks to tackle the issue in ensuring that the occupancy of new open market housing is as Principal Residency.
Employment Land	Policy EC1 Employment Development Policy EC3 Proposals for all types of employment-generating uses	Seeks to build on EC1 to sustain a vibrant successful town by supporting and encouraging local employment.
Small Business Units	Policy EC1 Employment Development	Seeks to support the creation of new businesses serving local needs where these are otherwise not available and where they are easily accessible to the whole community
Retail Provision	Policy EC1 Employment Development Policy EC2 Safeguarding Employment Sites Policy EC7 Retail Policy EC8 Main Town Centre Uses	This policy encourages a mix of uses that encourage vitality in the town centre. Within the context of the NPPF definition of 'main town centre uses', this could include employment-generating use. CDC Policy EC7 identifies Moreton-in-Marsh as a Key centre and EC8 is similarly supportive of main town centre uses, including office and retail, which generate employment.
Infrastructure Investment Priorities	Policy EC7 Retail Policy EC8 Main Town Centre Uses	Seeks to improve key facilities within Moreton-in-Marsh and ensure the necessary infrastructure is delivered to build a vibrant and successful town.
Local Green Spaces	Policy INF7 Green Infrastructure Policy EN3 Local Green Spaces	The policy designates twenty one Spaces in addition to those designated by EN3 and its wording is consistent with that policy and with the NPPF.

Neighbourhood Plan Policy	Development Plan Policy	Commentary
Conserving non-designated heritage assets	Policy EN13 Historic Environment: The Conversion of Non-Domestic Historic Buildings Policy EN12 Historic Environment: Non-Designated Heritage Assets	The policy is consistent with EN12 in seeking to conserve non-designated heritage assets in the Parishes, which are identified in Appendix D.
Enhancing Biodiversity	Policy EN1 Built, Natural & Historic Environment Policy EN8 Biodiversity and Geodiversity: Features, Habitats & Species	The policy is consistent with EN1 and EN8 in by seeking to preserve and improve the natural biodiversity features of Moreton-in-Marsh.
Important views	Policy EN1 Built, Natural & Historic Environment Policy EN14 The Wider Natural and Historic Landscape Policy EN5 Cotswold Area of Outstanding Natural Beauty (AONB) Policy EN6 Special Landscape Areas	The policy identifies Important Local Views that are special in recognising the intrinsic character and beauty of the countryside form but is not prescriptive about design solutions. The policy complements EN1 and EN4 by defining important views as an essential means of protecting and conserving the historic and natural open character of the setting to the town.
Development Boundary	Policy DS2 Development within Development Boundaries Policy DS4 Open Market Housing Outside Principal & Non-Principal Settlements	The policy redefines the Development Boundaries of Policy DS2 and its wording restates that of the policy. MiMNP Policy 19 identifies that development outside the settlement boundary should reflect these policy requirements.
Transport & Active Travel	Policy INF7 Green Infrastructure Policy INF3 Sustainable Transport	The policy complements INF3 and INF3 in encouraging proposals to better connect the town to its nearby attractions through sustainable means, e.g. walking and cycling and reduce reliance on vehicular travel.

7. Does not breach, and is compatible with, EU obligations and Human Rights requirements.

The Neighbourhood Development Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act.

The Plan and the process under which it was made conforms to the SEA Directive (EU 2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations). In May and June 2023, a draft screening report was prepared by Cotswold City Council. This was consulted on with the statutory bodies (the Environment Agency, Natural England and Historic England) to assist in the determination of whether or not the Moreton-in-Marsh Neighbourhood Plan would have significant environmental effects in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.

- In February 2025, Moreton-in-Marsh Town Council approached Cotswold District Council to request a screening report on the draft Neighbourhood Plan.
- In March 2025 LUC carried out an SEA Screening Opinion and in May 2025 Cotswold District Council confirmed they do not consider that an 'appropriate assessment' under Regulation 105 is required.

The various SEA screening documents, including the responses from the statutory bodies, has been submitted at Regulation 15 stage as part of the evidence base for the Plan.

8. Conformity with the prescribed conditions

Under Directive 92/43/EEC, also known as the Habitats Directive[2], it must be ascertained whether the draft Plan is likely to have significant effects on a European site designated for its nature conservation interest. The Directive is implemented by the Conservation of Habitats and Species Regulations 2010. Assessments under the regulations are known as Habitats Regulation Assessments ("HRA"). An Appropriate Assessment is required only if the Plan is likely to have significant effects on a European protected species or site. To ascertain whether or not it is necessary to undertake an assessment, a screening process is followed.

- In February 2025, Moreton-in-Marsh Town Council approached Cotswold District Council to request a screening report on the draft Neighbourhood Plan.
- In March 2025 Cotswold District Council there are no likely significant effects on Habitats Sites associated with the Plan, and no further HRA assessment is required..

The various screening documents, including the responses from the statutory bodies, has been submitted at Regulation 15 stage as part of the evidence base for the Plan.

9. Conclusion

The Basic Conditions as set out in Schedule 4B to the TCPA 1990 are considered to be met by the Moreton-in-Marsh Neighbourhood Plan and all the policies therein. It is therefore respectfully suggested to the Examiner that the Moreton-in-Marsh Neighbourhood Plan complies with Paragraph 8(1)(a) of Schedule 4B of the Act.

[2] Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora': http://eur-lex.europa.eu/legal- content/EN/TXT/?uri=CELEX:31992L0043 (retained).

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Moreton-in-Marsh Neighbourhood Plan

2018 - 2041

Consultation Statement



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CS Appendix 3 Developers Reg 14 Responses

CS Appendix 4 CDC Reg 14 Responses

1. Introduction and background

Work on preparing the Moreton-in-Marsh Neighbourhood Plan started in 2018. The parish council became increasingly concerned with the significant development pressure on the parish, caused by the lack of an up-to-date Local Plan and a desire to maintain a vibrant and thriving town centre. The Neighbourhood Area, which follows the parish boundary, was designated in September 2018 by the local authority, Cotswold District Council. Moreton-in-Marsh Town Council established a working group to take forward the process. This group included parishioners with different relevant skills and representation across interest groups, as well as past and present parish councillors.

2. Legal Obligations

1. This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Plan Regulations 2012. Section 15(2), part 5 of the Regulations sets out what a Consultation Statement should contain:

    (a) Contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;

    (b) Explains how they were consulted;

    (c) Summarises the main issues and concerns raised by the persons consulted;

    (d) Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

2. Community consultation has been a key priority for the NP steering committee since its inception in autumn 2018. Moreton-in-Marsh is a small town with a population of 5,000 and a number of businesses within the parish. Consultation was undertaken in a variety of ways to try and maximise responses.

3. Timing of the consultations was carefully considered to exploit potential interest and responses, and to coincide with regular and annual village events. The first stage was raising awareness of what a neighbourhood plan is and how it could benefit Moreton-in-Marsh. This started with a drop-in consultation event in February 2019. The results from this feedback informed three further public consultation events held during 2019, focussing on particular aspects of living in Moreton-in-Marsh. A comprehensive questionnaire was delivered to every home in March 2021 and a business survey was also conducted in March 2021.
4. Through the consultation process, many different aspects of importance to the community were raised and the steering group tried hard to ensure all these views and concerns were captured, regardless of whether they could be addressed through the Neighbourhood Plan.
5. The dedicated website was set up at the inception of the Neighbourhood Plan and the Town Council website created a link to direct people to it. This contained minutes from Steering Group meetings, detailed information regarding the Themes for the Neighbourhood Plan and reports from the surveys undertaken.

3. Consultation activities 2019-2020: Awareness raising.

1. Durind the summer/autumn of 2018 a campaign encouraging residents to join a Neighbourhood Plan working group was carried out using social media.

2. 2019 was spent raising awareness of the neighbourhood plan process and creating a Steering Group.

3. In February, a launch events was held to raise awareness of the Neighbourhood Plan and call for volunteers for the Steering Group. This was well-attended, with over 200 people attending and sharing their views.





4. In April 2019 a presentation was given at a local Business event 'Moreton Means Business'. A presentation was given which outlined the background to the Neighbourhood Plan and some examples of what other Neighbourhood Plans have done to encourage economic prosperity for their towns. The session was then thrown open to the attendees to get their views on business in the town and what could be done to help support the local economy.





5. A week later a Future Resilience & Climate Change workshop was conducted, facilitated by the Centre for Sustainable Energy, looking at the likely predicted impacts of climate change

within and beyond the plan period, and of how the community could plan for a sustainable future. The group, made up of members of the Steering Group and members



Ideas from the children

Resilience to extreme weather and protecting biodiversity

- Plants.
- More Meadows!
- And Animals!
- More flowers!
- No more cars!
- So no pollution!
- No plastic [make more open space parks with lots of trees and no swings zip lines etc… just nature with bins
- Animals
- Don't kill Lots of animals!
- Help. Us. Recycle. Plastic. It. Kills. Us!
- Habitats
- Stop chopping. Down. Trees!

Our buildings

Homes
- Each house to have a solar panel and charging points for cars
- Garages

School
- Nice kind schools with fun activities
- Better cooking standards at school

Business
- To stop using non-recyclable plastic
- Pizza hut

of the public suggested actions & policies ideas. The workshop outputs were written up by children from St. David's School, who added their own comments and suggestions

6. A website www.moreton2031.com was also created, with a timeline-which has been regularly updated throughout the process-and also provides options for contacting the SG along with records of the communication undertaken, reports from community consultation and documentation of evidence used to shape the Neighbourhood Plan.
7. The Steering Group established a communication programme to:

   i. Promote a high degree of awareness of the project

   ii. Invite residents to join the neighbourhood plan steering group

   iii. Encourage everyone to contribute to the development of the Moreton-in-Marsh Neighbourhood Plan.
8. In November 2019 Gloucestershire Rural Community Council was commissioned to undertake a Housing Needs Survey of Moreton-in-Marsh. This was published in May 2021 and can be found here.
9. April 2020-Covid lockdown unfortunately halted any more public consultation and slowed down the momentum of the neighbourhood plan.

4. Consultation activities in 2021: Initial Consultation.

1. In March 2021, the first community-wide consultation was undertaken. Approximately 3,000 leaflets were delivered to homes throughout the parish and made available and locations across the town, asking people for their opinions based on the six identified themes.

2. This 63-question document shaped the Vision and Objectives for the Neighbourhood Plan and information which arose from this consultation which was unrelated to the Neighbourhood Plan was reverted back to the Town Councils consideration.

3. The full results of the consultation can be found online at www.moreton2031.com, a summary of the results of the consultation are below:

- 43% of 830 respondents are over 60 years old, 44% are retired.
- Nearly 80% of respondents live alone or with one other person.
- 80% of respondents own their house, 18% rent.
- 96% of respondents agree Moreton-in-Marsh is an okay or great place to live
- Top 3 things people like about Moreton-in-Marsh: Access to countryside/greenspace; Access to rail network; Access to Cotswold towns & villages

5. Top 3 concerns about Moreton-in-Marsh: HGV Traffic and congestion; Excessive population growth; Loss of green space

Housing

- 65% would not support the NP identifying further housing sites. 15% didn't know.
- 24.5% of renters would support NP identifying housing sites. 15.5% of home owners would support identification of sites.
- Most support for 'Homes built to higher environmental standards' (60%). Second: 'Homes designed with accessibility for older/disabled people'.
- Least support for 'Large 4+ bed family houses' (26%) and 'retirement homes/assisted living'.
- Type of tenure most supported: Government starter homes.
- Least support for Open market housing.

Employment & Local Economy

- nearly 50/50 split of working/not working (which reflects age of respondents). Of the respondents who were over 75, 90% were not working.
- most popular method of travel to work car/van. Those who work within 5 miles of Moreton-in-Marsh, 83% travel by car/van (compared to 62% overall). Those who work within Moreton-in-Marsh 47% walk to work, 40% car/van
- 57% would support NP identifying further land for employment use
- 65% would support the NP identifying buildings for employment use within the town centre
- Medical facilities very highly regarded by respondents-Top Three: Doctors/Hospital/Pharmacies
- Most used facilities: grocery shops (65% use them frequently). *This question needs to consider the age of respondents, which may skew responses. E.g. 76% of respondents never use the pre-schools, which reflects the age of respondents (43% over 60 yrs old)*
- 81% respondents think the core town centre should be kept the same size.
- 38% want town centre protected; 49% believe Yes, some protection but recognise things change and we need to let this happen

Getting around Moreton-in-Marsh

- 66% of respondents walk when they want to visit Moreton-in-Marsh town centre
- 71% of children of respondents walk to pre-school or school
- 79% would support more dedicated walking and cycling routes within the town
- safer routes would encourage 29% of respondents to walk or cycle more, 21% would like better condition of routes
- 59% of respondents think it is fairly or very safe to walk/cycle around the town. 3% think it is very unsafe
- 60% feel current public transport options meet their need
- 63% believe the public rights-of-way around Moreton-in-Marsh are important or very important

Natural & Built Environment

- nearly 50% of respondents are 'satisfied' with the parks, open spaces and green spaces in Moreton-in-Marsh
- Respondents rated accessibility highest with regard to the existing parks and open spaces. Play equipment and facilities for older children had the lowest ratings
- Top 3 open/green spaces respondents believe should be protected: Duck Pond; High Street Greens; Queen Victoria Gardens. All 12 suggested spaces received over 50%
- 56% of respondents believe the amount of green space should be increased. Over 250 suggestions of how this could happen were received!
- 73% of respondents believe biodiversity in Moreton-in-Marsh is somewhat important or very important
- 175 suggestions of locations to introduce or enhance biodiversity were received
- 67% of respondents believe the historic buildings in Moreton-in-Marsh are very important

Climate Change & Energy

- 24% strongly agree and 38% agree with the statement "The town should aim to be self-sufficient in locally generated renewable energy, as far as possible"
- Roof-based solar panels and ground and air-source heat pumps receive the most support with just over 50% of respondents supporting each of them
- The 2 statements "Renewable energy projected should be supported as long as they are partially owned by the community, such as a joint venture with a commercial energy provider" and "Renewable energy projects by commercial developers should be supported, as long as they are required to make some financial benefit payments to the town annually" both received the highest support with 44% of respondents agreeing with each of them
- nearly 60% of respondents agree with the statement "I feel that climate change is a risk to me and my family". Just over 40% disagree with the statements "My property is at risk of flooding" and "I struggle to keep my home warm in the winter"
- Over 320 suggestions for actions households can take to reduce carbon emissions were received

The Community

- 70% of respondents very or fairly satisfied with the local services and amenities in Moreton-in-Marsh.
- 46% of respondents would like to see more community facilities in Moreton-in-Marsh. There were over 200 suggestions of what households would like
- 78% of respondents feel there is high/good/some community spirit in Moreton-in-Marsh
- 70% of respondents support future funding being directed towards public footpaths/bridleways, closely followed by a wildflower meadow (68%)
- Over 650 comments were received in response to us asking if you had any other observations to make!

4. In March 2021 a Business survey was also conducted which was completed by 50 businesses.

5. The remainder of 2021 and 2022 was spent working through the residents' survey, considering the substantial responses and discussions within the Steering Group of how to best ensure all the information gathered was considered and the community felt their input was heard.



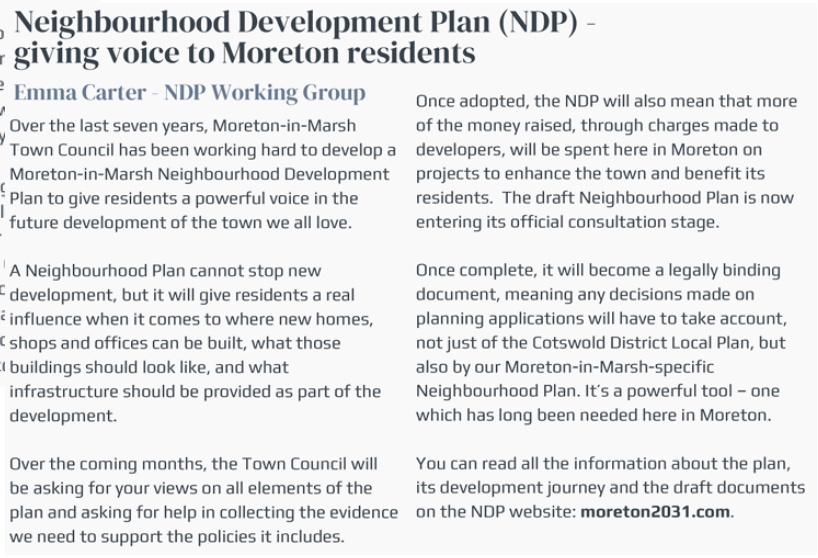
Neighbourhood Development Plan

Peter Richardson, Chair - Neighbourhood Development Plan (NDP) Working Group

The NDP is a community-led plan managed through the Town Council. It should align with the Cotswold District Council (CDC) Local Plan (up to 2031) but allows us to protect our green spaces, important views, and biodiversity.
It also means we can specify: the types of development we want, including style, size, sustainability of housing; and the criteria for development e.g. infrastructure.

It takes the form of a number of policies and priorities. The policies (supported by justifications) should hold the same weight as the Local Plan policies when examining planning applications.
We've just submitted the draft plan to CDC for screening to check if certain environmental studies are required.
Before final submission there will be a public consultation period, a formal submission to

CDC, updates to the p
on feedback, and ther
independent examine
comments. Finally it v
taken to a community
referendum.
We are a hard workin
residents and councill
passionate about our
you would like to join
members always welc
follow progress you c
through our dedicatec
www.moreton2031.c



Neighbourhood Development Plan (NDP) - giving voice to Moreton residents

Emma Carter - NDP Working Group

Over the last seven years, Moreton-in-Marsh Town Council has been working hard to develop a Moreton-in-Marsh Neighbourhood Development Plan to give residents a powerful voice in the future development of the town we all love.

A Neighbourhood Plan cannot stop new development, but it will give residents a real influence when it comes to where new homes, shops and offices can be built, what those buildings should look like, and what infrastructure should be provided as part of the development.

Over the coming months, the Town Council will be asking for your views on all elements of the plan and asking for help in collecting the evidence we need to support the policies it includes.

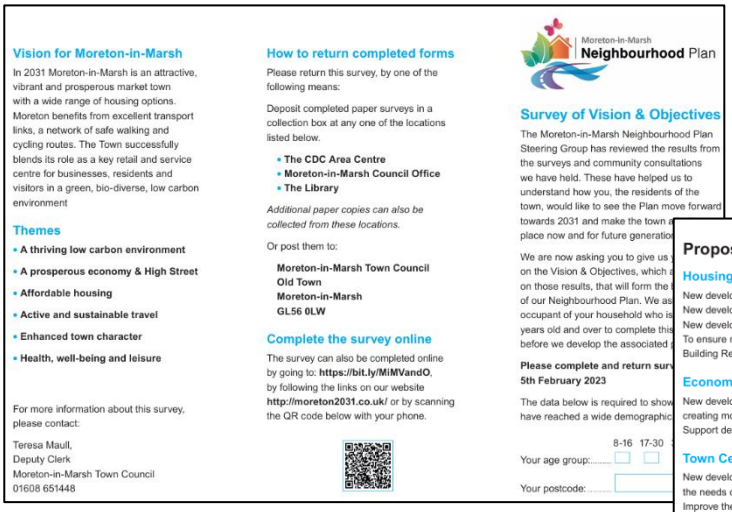
Once adopted, the NDP will also mean that more of the money raised, through charges made to developers, will be spent here in Moreton on projects to enhance the town and benefit its residents. The draft Neighbourhood Plan is now entering its official consultation stage.

Once complete, it will become a legally binding document, meaning any decisions made on planning applications will have to take account, not just of the Cotswold District Local Plan, but also by our Moreton-in-Marsh-specific Neighbourhood Plan. It's a powerful tool – one which has long been needed here in Moreton.

You can read all the information about the plan, its development journey and the draft documents on the NDP website: **moreton2031.com**.

5. Consultation Activities in 2023: Continued Consultation.

1. In January 2023 the Vision & Objective survey was carried out, with surveys being delivered to every home in the parish and promoted online via social media and the Town Council website.



Vision for Moreton-in-Marsh

In 2031 Moreton-in-Marsh is an attractive, vibrant and prosperous market town with a wide range of housing options. Moreton benefits from excellent transport links, a network of safe walking and cycling routes. The Town successfully blends its role as a key retail and service centre for businesses, residents and visitors in a green, bio-diverse, low carbon environment

Themes

- **A thriving low carbon environment**
- **A prosperous economy & High Street**
- **Affordable housing**
- **Active and sustainable travel**
- **Enhanced town character**
- **Health, well-being and leisure**

For more information about this survey, please contact:

Teresa Maull,
Deputy Clerk
Moreton-in-Marsh Town Council
01608 651448

How to return completed forms

Please return this survey, by one of the following means:

Deposit completed paper surveys in a collection box at any one of the locations listed below.

- **The CDC Area Centre**
- **Moreton-in-Marsh Council Office**
- **The Library**

Additional paper copies can also be collected from these locations.

Or post them to:

Moreton-in-Marsh Town Council
Old Town
Moreton-in-Marsh
GL56 0LW

Complete the survey online

The survey can also be completed online by going to: **https://bit.ly/MiMVandO**, by following the links on our website **http://moreton2031.co.uk/** or by scanning the QR code below with your phone.

Moreton-in-Marsh **Neighbourhood** Plan

Survey of Vision & Objectives

The Moreton-in-Marsh Neighbourhood Plan Steering Group has reviewed the results from the surveys and community consultations we have held. These have helped us to understand how you, the residents of the town, would like to see the Plan move forward towards 2031 and make the town a place now and for future generatio

We are now asking you to give us on the Vision & Objectives, which on those results, that will form the of our Neighbourhood Plan. We as occupant of your household who is years old and over to complete this before we develop the associated

Please complete and return surv 5th February 2023

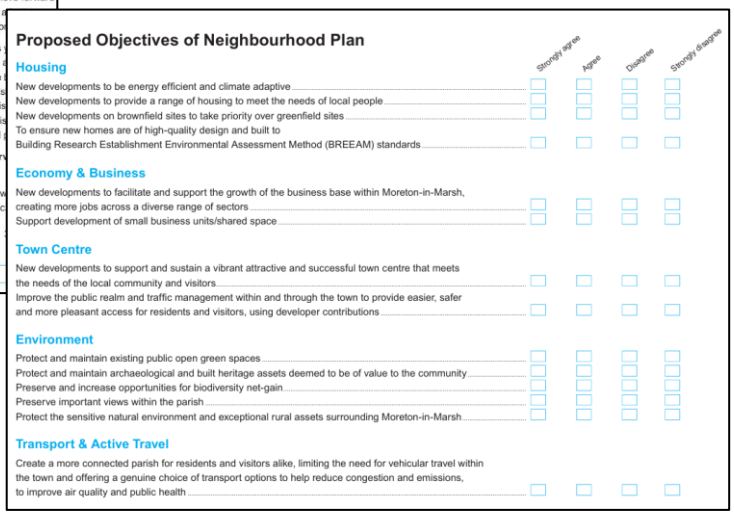
The data below is required to show have reached a wide demographic

8-16 17-30

Your age group:

Your postcode:

2. This received 473 responses or approximately 11% of the community and showed overwhelming support for the Vision and Objectives.



Proposed Objectives of Neighbourhood Plan

Strongly agree | Agree | Disagree | Strongly disagree

Housing

New developments to be energy efficient and climate adaptive
New developments to provide a range of housing to meet the needs of local people
New developments on brownfield sites to take priority over greenfield sites
To ensure new homes are of high-quality design and built to Building Research Establishment Environmental Assessment Method (BREEAM) standards

Economy & Business

New developments to facilitate and support the growth of the business base within Moreton-in-Marsh, creating more jobs across a diverse range of sectors
Support development of small business units/shared space

Town Centre

New developments to support and sustain a vibrant attractive and successful town centre that meets the needs of the local community and visitors
Improve the public realm and traffic management within and through the town to provide easier, safer and more pleasant access for residents and visitors, using developer contributions

Environment

Protect and maintain existing public open green spaces
Protect and maintain archaeological and built heritage assets deemed to be of value to the community
Preserve and increase opportunities for biodiversity net-gain
Preserve important views within the parish
Protect the sensitive natural environment and exceptional rural assets surrounding Moreton-in-Marsh

Transport & Active Travel

Create a more connected parish for residents and visitors alike, limiting the need for vehicular travel within the town and offering a genuine choice of transport options to help reduce congestion and emissions, to improve air quality and public health

3. The Town Council held an Open Day to showcase projects they were undertaking, one of which was the Neighbourhood Plan.

6. Consultation activities in 2023-24: Evidence gathering, Policy writing.

1. Much of 2023/24 was spent writing policies and gathering evidence to support these.

2. During this time the website was kept updated with minutes and social media posts written to keep the community updated with the activities of the Neighbourhood Plan.

7. Consultation activities in 2025: Screening/Evidence gathering.

1. The Neighbourhood Plan was submitted to CDC in February 2025 for screening.
2. In May 2025 CDC confirmed that no SEA or HRA were required.
3. The Town Council held Forum events in January and June 2025 at which the Neighbourhood Plan was discussed and questions invited.

8. Continuous Consultation

1. Website – has been constantly updated and regularly promoted
2. Emails – built up list of subscribers who receive monthly updates
3. Social media – Nextdoor, FB – updates on the plan progress and also information about upcoming engagements.
4. NDP updates included in MTC quarterly updates issued via their mailing list and hardcopies at various locations in the town

9. Regulation 14 Pre-submission Consultation 2025.

1. The six-week consultation period required under Regulation 14 ran from 1st September to 12th October 2025. To encourage as many local people as possible to engage in the consultation, various methods of communication were used. These included the preparation of a twenty four-page 'executive summary' of the Regulation 14 neighbourhood plan including a feedback form and links to digital feedback methods, which were delivered to every house in the parish. Printed paper copies of the full plan were available to read at the Town Council Offices, the Area Centre and library. Digitally, people were invited to access full plan, all the supporting evidence documents and feedback forms online on the dedicated Moreton2031 website. Information about the consultation, links to the neighbourhood plan website and digital feedback websites were also available on the Town Council website. A full digital feedback form was available via the survey website SurveyMonkey, with Paper versions available from the Town Council Offices.

2. In addition, an article highlighting the importance of the Regulation 14 consultation and directing people to where to find more information about the Neighbourhood Plan posts were made on social media directing people to the parish council website and SurveyMonkey feedback form.

3. In accordance with requirements of the Neighbourhood Planning Regulations, relevant statutory consultees were notified by letter. In addition, a range of parties that the Moreton-in-Marsh Neighbourhood Plan steering group considered were likely to have an interest in the plan were

also written to. All parties were advised to download a copy of the plan but were advised that hard copies could be issued on request. The list of Consultees can be found in Appendix 1.

4. As Appendix 2 & 3 show, while there were a few negative comments, the people who responded to the consultation were supportive of the NP policies. Appendix 4 shows the detailed comments by the local planning authority. These have been studied and changes made to satisfy the Basic Conditions criteria and improve clarity. The tables detail the working group responses to the comments received and actions and/or text changes made.

10. Conclusion.

Consultation has played a prominent role in shaping the preparation of the MIMNP, and every effort has been made to engage with the widest possible audience within the community. Interest in the plan increased over the years it has taken to prepare the NP. A visible presence of the Neighbourhood Plan at key, well attended village events each year has helped maintain the plan preparation's profile, along with regular updates in the village news magazine.

Appendix 1 List of Consultees

Gloucestershire County Council	Moreton-in-Marsh YFC/Gloucs Federation of Young Farmers
Cotswold District, Gloucestershire	Cotswold National Landscape,
West Oxfordshire District, Oxfordshire	GCER
Stratford-on-Avon District, Warwickshire	Glos Wildlife Trust
Bourton on the Hill PC, Gloucestershire	Costwold Friends
Todenham PC, Gloucestershire	Moreton Charity
Evenlode PC, Gloucestershire	Edith Mann Trust
Batsford PC, Gloucestershire	RH Trust
Longborough PC, Gloucestershire	WI
Sezincote PC, Gloucestershire	Scouts
The Wolfords Joint Parish Council, Warwickshire South	Football Club
Little Compton PC, Warwickshire South	Croquet club
Chastleton PC, Oxfordshire	Bowling club
Coal Authority	Cricket club
Homes England	Tennis club
Natural England	Fields In Trust
Environment Agency	Gloucs Diocese
Historic England	St David's Church of England
Network Rail	South West Mids Congregational Federation
National Highways	Congregational Church
Marine Management Organisation	Confederation of British Industry
EE	National Housing Federation
O2	Chamber of Commerce Glos (Business West)
Three	Glos LEP
Vodaphone	Federation of Small Businesses (South West)
Director of Public Health Glos	Road Haulage Association
NHS England	Homebuilders Federation
NHS Gloucestershire	Cala Homes
White House Surgery	Bloor Homes
Mann Cottage Surgery	Nightingale Gardens (Moreton) management Co Ltd (Prev Deeley Homes)
Dentist	Disability Rights
National Grid	Insight Gloucestershire
National Gas	HFT Learning Disability Support
Wales and West Utilities	OPCC Gloucestershire
Severn Trent	Gloucestershire Fire and Rescue Service
Thames Water	Tinkers Close Housing Association
Campaign for the Protection of Rural England	Bromford Housing Association
RSPB Gloucestershire	St David's School
Sport England	Tyack Architects Ltd (Mann Institute Gardens)
Bromford Housing Association	Owner of Special habitat area behind Stockwells

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Moreton-in-Marsh Neighbourhood Plan

2018 - 2043

Equalities Impact Assessment



1. Introduction

Neighbourhood Plans fall within the remit of the Equality Act 2010. This legislation seeks to ensure that no groups or individuals are disadvantaged as a result of decisions being made, which fail to take account of their requirements and that policies and decision making do not discriminate either accidentally or deliberately.

The reason for carrying out this Equality Impact Assessment (EIA) is to ensure that decisions made by Moreton-in-Marsh Town Council on the Neighbourhood Plan are based on sound evidence and will not discriminate against anyone with any of the 9 protected characteristics shown below.

PROTECTED CHARACTERISTICS

Age: Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

Disability: A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Gender Reassignment: The process of transitioning from one gender to another.

Marriage and Civil Partnership: Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

Pregnancy and Maternity: Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Race: Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Religion and belief: Religion has the meaning usually given to it, but belief includes religious and philosophical beliefs including lack of belief (e.g., Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Sex: Man or a woman.

Sexual orientation: Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

2. EQUALITY IMPACT ASSESSMENTS AND NEIGHBOURHOOD PLANS.

Whilst it is unlikely that a Neighbourhood Plan would have a significant impact on a group with protected characteristics; the possibility still exists and therefore there is a requirement to screen the presumed outcomes of policies.

It is also important to note that the Moreton-in-Marsh Neighbourhood Plan has been drafted following significant consultation with the resident community as set out in the Consultation Statement which is an appendix to the Plan.

3. ASSESSING THE PLAN POLICIES

This EIA has been produced to assess the implications of policies included in the Moreton-in-Marsh Neighbourhood Plan. This has been produced utilising guidance on the Equality and Human Rights Commission and Department of Communities and Local Government websites.

The following Tables assess the Plan's policies for their likely impact on the protected characteristics: positive, neutral or negative impacts are noted.

Where an impact is positive or neutral, no change will be made to the policy. Where a negative impact is noted a grading is assigned; 'high' means that mitigation is unlikely to overcome the issue; 'medium' means that future or existing mitigation could overcome the issue; 'low' means that the issue is judged insignificant.

The results of this assessment have not lead to final changes prior to submission.

Policy 1 Climate Adaption & Energy Efficiency in Developments	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age		X			
Disability		X			
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary:	Applicable to the whole community				
Mitigation	None required.				

Policy 2 Managing Flood Risk	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age		X			
Disability		X			
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	Applicable to the whole community				
Mitigation	None required.				

Policy 3 Housing Mix	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age	X				
Disability	X				
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	This policy is intended to provide for the aging population in the parish and improve opportunities for younger generations to live within the parish.				
Mitigation	None required.				

Policy 4 Affordable Housing	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age	X				
Disability	X				
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	This policy is intended to provide for the aging population in the parish and improve opportunities for younger generations to live within the parish.				
Mitigation	None required.				

Policy 5 Well designed Housing and Place	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age	X				
Disability	X				
Marriage or civil partnership		X			
Pregnancy and maternity	X				
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	Applicable to the whole community.				
Mitigation	None required.				

Policy 6 Parking Residential Developments	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age	X				
Disability	X				
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			

Commentary	This Policy is specifically aimed at ensuring future developments have safe accessibility throughout the Parish.
Mitigation	None required.

Policy 7 Brownfield First	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age		X			
Disability		X			
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	This policy is intended to enhance the existing assets in the Parish to the benefit of the whole community.				
Mitigation	None required.				

Policy 8 Hard Infrastructure	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age		X			
Disability		X			
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	Applicable to the whole community.				
Mitigation	None required				

Policy 9 Soft Infrastructure	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age		X			
Disability		X			
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	Applicable to the whole community.				

Mitigation	None required.

Policy 10 Principle Residence Housing	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age		X			
Disability		X			
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	This Policy is specifically aimed at ensuring future developments have safe accessibility throughout the Parish.				
Mitigation	None required				

Policy 11 Employment Land	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age		X			
Disability		X			
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	Applicable to the whole community				
Mitigation	None required				

Policy 12 Small Business Units	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age	X				
Disability	X				
Marriage or civil partnership		X			
Pregnancy and maternity	X				
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			

Commentary	This Policy is specifically aimed at maximising opportunities for small/new businesses to succeed in the parish and keep the town active and vibrant.
Mitigation	None required

Policy 13 Retail Provision	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age	X				
Disability	X				
Marriage or civil partnership		X			
Pregnancy and maternity	X				
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	This Policy is specifically aimed at ensuring all members of the community have access to local retail facilities within the town.				
Mitigation	None required				

Policy 14 Infrastructure Investment Priorities	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age	X				
Disability	X				
Marriage or civil partnership		X			
Pregnancy and maternity	X				
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	This Policy is specifically aimed at ensuring future developments have safe accessibility to the Parish				
Mitigation	None required				

Policy 15 Local Green Space	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age		X			
Disability		X			
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			

Gender reassignment		X			
Commentary	Applicable to the whole community				
Mitigation	None required				

Policy 16 Conserving non-designated heritage assets	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age		X			
Disability		X			
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	This policy is intended to enhance the existing assets in the Parish to the benefit of the whole community.				
Mitigation	None required				

Policy 17 Enhancing Biodiversity	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age		X			
Disability		X			
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	Applicable to the whole community				
Mitigation	None required				

Policy 18 Important Views	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age		X			
Disability		X			
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			

Commentary	Applicable to the whole community
Mitigation	None required

Policy 19 Development Boundary	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age		X			
Disability		X			
Marriage or civil partnership		X			
Pregnancy and maternity		X			
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	Applicable to the whole community				
Mitigation	None required				

Policy 20 Transport & Active Travel	Positive	Neutral	Neg.L.	Neg.M.	Neg.H.
Protected Characteristic					
Age	X				
Disability	X				
Marriage or civil partnership		X			
Pregnancy and maternity	X				
Race		X			
Religion and belief		X			
Sex		X			
Sexual orientation		X			
Gender reassignment		X			
Commentary	This Policy is specifically aimed at ensuring future developments have safe accessibility to the Parish and to Basingstoke Parish				
Mitigation	None required				

4. BASELINE DATA

Data for Moreton-in-Marsh is available for the following protected characteristics: age, ethnicity, marital status, religious belief, and disability.
The Data in the tables below comes from the below comes from the 2021 Census.

There were approximately 5,190 people living in Moreton-in-Marsh in 2021. Of these, 47.6% were male and 52.4% were female.

Age	**%**
0-4	5.4
5-14	10.5
15-19	4.5
20-64	53.4
65-84	22.5
85+	4.3
Ethnicity	**%**
Asian, Asian British or Asian Welsh	0.9
Black, Black British, Black Welsh, Caribbean or African	0.3
Mixed or Multiple ethnic groups	1.2
White	97.2
Other ethnic group	0.3
Marital Status (aged 16 and over)	**%**
Never married and never registered a civil partnership	29.7
Married or in a registered civil partnership	48.7
Separated, but still legally married or still legally in a civil	2.8
Divorced or civil partnership dissolved	10.7
Widowed or surviving civil partnership partner	8.1
Religious Belief	**%**
No religion	39.8
Christian	53.9
Buddhist	0.3
Hindu	0.1
Jewish	0.0
Muslim	0.1
Sikh	0.1
Other religion	0.3
Not answered	5.4
Disability	**%**
Disabled under the Equality Act	17
Not disabled under the Equality Act	83

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Joseph Walker
Cotswold District Council
by email

Dear Joseph

Our reference
11703

Date
26 March 2025

Address
12th Floor, Beacon Tower
Colston Street
Bristol BS1 4XE
Tel: 0117 389 0700

HRA Screening of Moreton-in-Marsh Neighbourhood Plan

This letter sets out the Habitats Regulations Assessment (HRA) Screening of the draft Moreton-in-Marsh Neighbourhood Plan, January 2025. In summary, there are no likely significant effects on Habitats Sites associated with the Plan, and no further HRA assessment is required. This letter explains why.

Summary of the Moreton-in-Marsh Neighbourhood Plan

Cotswold District Council, as the local Planning Authority (LPA), designated the Moreton-in-Marsh Neighbourhood Area in September 2018 to enable Moreton-in-Marsh Town Council to prepare a Neighbourhood Plan. The Neighbourhood Plan for Moreton-in-Marsh will form part of the development plan over the period 2018 to 2031, alongside the Local Plan for Cotswold District Council 2011 - 2031[1].

Neighbourhood Plans are intended to provide local principles and requirements that supplement the Local Plan policies and site allocations. The Moreton-in-Marsh Neighbourhood Plan has an overarching vision, which is supported by a series of objectives. The objectives for the Moreton-in-Marsh are used as a framework for a total of twenty-one (21) policies which provide principles for local development across five topic areas, including housing, economy and business, town centre, the environment, and transport and active travel.

These provide local principles to supplement the overarching Cotswold District Local Plan policies; and to ensure that new development (e.g. housing) proposed in Moreton-in-Marsh can be accommodated in a way that is sustainable.

The current Cotswold District Plan 2011-2031 Policy S18 Moreton-in-Marsh allocates the following housing, employment, and employment development sites in Moreton-in-Marsh:

Housing development sites

- Land at Evenlode Road (63 dwellings)

[1] Cotswold District Council Local Plan 2011-2013. Available at: https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-2011-to-2031/

- Land south east of Fosseway Avenue (91 dwellings and 28 dwellings on two sites)
- Former hospital site (21 dwellings)

Employment sites

- Cotswold Business Park/Village
- Fosseway Industrial Estate

Employment development sites

- Fire Service College B (7ha)

The Neighbourhood Plan does not allocate any additional development sites, but sets out principles for new development in Moreton-in-Marsh, e.g. a development boundary outside which development would not be supported, parking standards and housing mix. Some of the policies support small scale development, infrastructure, or changes of use; in line with the Local Plan policies.

The Neighbourhood Plan is a new plan and has not previously been subject to HRA. However, HRA has been undertaken for the overarching Cotswold Local Plan. The Local Plan was adopted in 2018 and the most recent iteration of the HRA of the Local Plan was prepared by LUC in 2017[2]. LUC is currently undertaking the HRA of the Local Plan Partial Update. Information from the Local Plan HRAs has informed HRA Screening of the Neighbourhood Plan, where relevant.

Requirement for HRA

The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007[3]; the currently applicable version is the Habitats Regulations 2017[4], as amended. Prior to adopting the Moreton-in-Marsh Neighbourhood Plan, the Council is therefore required by law to carry out an HRA. The Council can commission consultants to undertake HRA work on its behalf and this (the HRA Screening documented in this letter) is then reported to and considered by the Council as the 'competent authority'. The Council will consider this work and would usually only progress a plan if it considers that the plan will not adversely affect the integrity[5] of any Habitats Site.

HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). The NPPF[6] and good practice guidance[7] confirms that Ramsar sites should be treated in the same way as SACs and SPAs, in HRA. For simplicity, and in line with common usage, this letter uses the term 'Habitats Sites' to refer to all types of designated site within the 'national site network' for which Government guidance[8] requires an HRA.

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[2] https://www.cotswold.gov.uk/media/fcolqyq3/5501-habitats-regulations-assessment-report-apr-2017.pdf
[3] HM Government (2007) The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (SI No. 2007/1843) [online]. Available at: https://www.legislation.gov.uk/uksi/2007/1843/contents
[4] HM Government (2017) The Conservation of Habitats and Species Regulations 2017 (SI No. 2017/1012) [online]. Available at: https://www.legislation.gov.uk/uksi/2017/1012/contents/made, as amended by HM Government (2019) The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI No. 2019/579) [online]. Available at: https://www.legislation.gov.uk/ukdsi/2019/9780111176573
[5] The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated. (Source: UK Government Planning Practice Guidance)
[6] MHCLG, (2024). National Planning Policy Framework, para 194. Ministry of Housing Communities & Local Government. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf
[7] The HRA Handbook, Section A3. David Tyldesley & Associates, a subscription based online guidance document: https://www.dtapublications.co.uk/handbook/European
[8] Department for Environment, Food and Rural Affairs, Natural England, Welsh Government and Natural Resources Wales (2021) Habitats regulations assessments: protecting a European site, www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site

HRA approach

The HRA of development plans is undertaken in stages, as summarised below:

1. **HRA Screening**: determine whether the plan have 'likely significant effects' on a Habitat Site, alone or in combination with other plans or projects. This stage identifies potential impact pathways, based on the characteristics of Habitats Sites in proximity to the plan area.
2. **Appropriate Assessment:** where likely significant effects are identified, the Appropriate Assessment comprises a more detailed assessment, taking into account mitigation, for example in policy wording. This stage identifies whether the plan will have an adverse effect on the integrity of any Habitats Sites, alone or in-combination, with reference to those sites' conservation objectives[9].
3. **'Imperative reasons of overriding public interest'** (IROPI): in rare cases, where adverse effects on integrity cannot be ruled out by the time a plan is adopted, 'IROPI' will need to be demonstrated and compensation provided.

It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid or reduce effects. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

This letter presents the findings of the HRA Screening.

In order to initiate the search of Habitats Sites that could potentially be affected by a development, it is established practice in HRA to consider Habitats Sites within the area covered by the plan and other sites that may be affected beyond this area.

A distance of 15km from the boundary of the plan area is typically used in the first instance to identify Habitats Sites with the potential to be affected by the proposals within a development plan. Consideration is then given to whether any more distant Habitats Sites may be connected to the plan area via effects pathways, for example through hydrological links or recreational visits by residents. Impacts from development in areas outside of the Habitats Site boundaries may also occur where habitat contributes towards maintaining the interest feature for which the Habitats Site is designated (known as 'functionally linked land'). This includes land which may provide offsite foraging and roosting habitat for birds.

The 15km distance has been agreed with Natural England for HRAs elsewhere and is considered precautionary.

HRA Screening conclusion

In this case, there are no Habitats Sites within 15km of the Plan area, and none beyond that distance that are considered to have impact pathways (e.g. hydrological connectivity) that could lead to likely significant effects. This is shown in the figure, overleaf.

The Neighbourhood Plan also does not allocate additional development beyond that already in the Local Plan, which has been subject to HRA. Any changes to the Local Plan will be assessed further in the HRA of the Local Plan Partial Update.

Therefore, there are no impact pathways and no likely significant effects. As such, no further HRA (i.e. Appropriate Assessment) of the Moreton-in-Marsh Neighbourhood Plan is required.

[9] Conservation objectives are published by Natural England for SACs and SPAs. Available at: http://publications.naturalengland.org.uk/category/6490068894089216

Yours sincerely



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Cotswold Local Plan HRA
Cotswold District Council

LUC

Nearest Habitat Sites to Moreton-in-Marsh Neighbourhood Plan area

- Cotswold District boundary
- Moreton-in-Marsh parish boundary
- Moreton-in-Marsh parish boundary 15km buffer
- Special Area of Conservation

15km

Bredon Hill SAC

Dixton Wood SAC

Cotswold Beechwoods SAC

Oxford Meadows SAC

N 0 5 10 km

Map scale 1:225,000 @ A3

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Moreton-in-Marsh Neighbourhood Plan

SEA Screening Opinion

Cotswold District Council

Final report

Prepared by LUC

March 2025

Version	Status	Prepared	Checked	Approved	Date
1	Final report	T Uzuegbunam	K Nicholls	K Nicholls	27.03.2025

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Chapter 1

Introduction

1.1 Moreton-in-Marsh Town Council is preparing a Neighbourhood Plan, through the Moreton-in-Marsh Neighbourhood Plan Steering Group (MiMNPSG). Moreton-in-Marsh is a thriving market town within Cotswold District in the north east of Gloucestershire. The Neighbourhood Plan will cover the full extent of the electoral boundary of the Town Council.

1.2 LUC has been appointed by Cotswold District Council to consider whether there is a need for Strategic Environmental Assessment (SEA) to be undertaken for the Neighbourhood Plan. SEA may be required for a Neighbourhood Plan if it is likely to have significant environmental effects. Sustainability Appraisal (SA) is similar to SEA but includes assessment of the likely significant effects of a plan or programme on economic and social factors, as well as environmental factors. Planning Practice Guidance (PPG) **[See reference 1]** clarifies that there is no legal requirement for a neighbourhood plan to be subject to SA, but that SA can be used to demonstrate how the plan will contribute to sustainable development.

1.3 Cotswold District Council has commissioned LUC to carry out SEA Screening of the Draft Moreton-in-Marsh Neighbourhood Plan (January 2025) in order to determine whether an assessment is required under European Directive 2001/42/EC (the SEA Directive), transposed into UK law through the SEA Regulations **[See reference 2]**.

Chapter 2

SEA Screening

Scope of the Moreton-in-Marsh Neighbourhood Plan

2.1 Cotswold District Council, as the local Planning Authority (LPA), designated the Moreton-in-Marsh Neighbourhood Area in September 2018 to enable Moreton-in-Marsh Town Council to prepare the Neighbourhood Plan. The community, through the Moreton-in-Marsh Neighbourhood Plan Steering Group (MiMNPSG), has been involved in producing the Draft Moreton-in-Marsh Neighbourhood Plan on behalf of Moreton-in-Marsh Town Council.

2.2 The Neighbourhood Plan covers the entire Parish of Moreton-in-Marsh. The Draft Neighbourhood Plan contains a vision for the future of Moreton-in-Marsh along with 14 objectives to realise this vison, presented under five themes:

- Housing Objectives

1. New developments to be energy efficient and climate adaptive.

2. New developments to provide a range of housing to meet the needs of local people.

3. New developments on brownfield sites to take priority over greenfield sites.

4. To ensure new homes are of high-quality design and built to Building Research Establishment Environmental Assessment Method (BREEAM) standards.

- Economy & Business

5. New developments to facilitate and support the growth of the business base within Moreton-in-Marsh, creating more jobs across a diverse range of sectors.

6. Support development of small business units/shared space.

- Town Centre

7. New developments to support and sustain a vibrant attractive and successful town centre that meets the needs of the local community and visitors.

8. Improve the public realm and traffic management within and through the town to provide easier, safer and more pleasant access for residents and visitors, using developer contributions.

- Environment

9. Protect and maintain open green spaces.

10. Protect and maintain archaeological and built heritage assets deemed to be of value to the community.

11. Preserve and increase opportunities for biodiversity net gain.

12. Preserve important views within the parish.

13. Protect the sensitive natural environment and exceptional rural assets surrounding Moreton-in-Marsh.

- Transport & Active Travel

14. Create a more connected parish for residents and visitors alike, limiting the need for vehicular travel within the town and offering a genuine choice of transport options to help reduce congestion and emissions, to improve air quality and public health.

2.3 The Neighbourhood Plan then sets out 21 planning policies to realise the Vision for Moreton-in-Marsh. These policies address five topic areas: Housing, Economy and Business, Town Centre, The Environment, and Transport and Active Travel.

2.4 No sites have been allocated for development within the Neighbourhood Plan; rather the policies in the Housing section of the Neighbourhood Plan set out criteria that will apply to housing allocated through the Cotswold District Local Plan. Policy Three sets out criteria for housing proposals within the Parish in relation to housing mix, while Policy Four sets out criteria relating to affordable housing provision. Policy Five sets out criteria for housing proposals to demonstrate high-quality design, while Policy Six sets out that new residential developments must provide adequate off-street parking for residents and visitors.

2.5 Other policies in the Neighbourhood Plan address a range of topics including employment land, retail provision, local green spaces and biodiversity. Together these policies seek to ensure that new development in Moreton-in-Marsh is high quality and sensitively designed so as not to have adverse impacts on the surroundings and that it contributes positively to the town.

Baseline Information

2.6 This section summarises baseline information for the town of Moreton-in-Marsh, drawing from publicly available data and the information set out in the Draft Neighbourhood Plan.

Context

2.7 Moreton-in-Marsh is a parish located within Cotswold District. The town is the major centre in the north Cotswolds.

Biodiversity, Flora and Fauna

2.8 There are no Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites within Moreton-in-Marsh, the nearest being Dixton Wood (SAC) 22.2km west of Moreton-in-Marsh.

2.9 There are a number of Sites of Special Scientific Interest (SSSIs) around Moreton-in-Marsh, although none are within the area covered by the Neighbourhood Development Plan:

- Wolford Wood and Old Covert (SSSI) is approximately 0.6km to the east;
- Bourton Down (SSSI) is 4.8km to the west;
- New Park Quarry (SSSI) is 4.8km south-west;
- Wellarce Quarry (SSSI) is 5.4km to the north;
- Cross Hands Quarry SSSI is 5.5km to the south east;
- Stretton-on-Fosse Pit (SSSI) is 5.9km to the north;
- Whichford Wood SSSI is 7.2km to the east;
- Hornsleasow Quarry (SSSI) is 7.4km to the west;
- Hornsleasow Roughs (SSSI) is 8.8km west of Moreton-in-Marsh;
- Midsummer Meadow (SSSI) is 9.3km north-east;
- Campden Tunnel Gravel Pit (SSSI) is 9.5km north-west;
- Broadway Hill (SSSI) is 9.8km north-west;
- Salmonsbury Meadows (SSSi) is 10.1km south-west;

- Huntsman's Quarry (SSSI) is 10.1km south-west
- Bould Wood SSSI is 11.0km to the south;
- Sharp's Hill Quarry SSSI is 11.3km to the north east;
- Sarsgrove Wood SSSI is 11.3km to the south east;
- Lark Wood is 11.3km south-west;
- Harford Railway Cutting (SSSI) and Brassey Reserve and Windrush Valley (SSSI) are 11.5km south-west;
- Glyme Valley SSSI is 12.1km to the south east; and
- Jackdaw Quarry is 12.8km west.

2.10 All are in favourable condition.

2.11 Within Cotswold District as a whole, there are over 260 locally designated Key Wildlife Sites. There are also a number of protected species within the Cotswold District, including bat species, great crested newts, water voles, otters, nesting birds, and badgers, and a number priority habitats, including:

- ancient or species-rich hedgerows;
- floodplain grazing marsh;
- fen, marsh, swamp and reedbeds;
- lowland beech and yew woodland;
- lowland calcareous grassland (e.g. species-rich chalk and limestone grasslands);
- lowland meadows (e.g. species-rich flower meadows);
- lowland mixed deciduous woodland (ancient woodland);
- lowland wood-pasture and parkland;
- rivers and streams;
- standing open water and canals (e.g. lakes and flooded gravel pits); and

- wet woodland.

Population

2.12 In 2021, Moreton-in-Marsh had a population of 5,015 people. This is an increase from the 2011 Census when 3,493 people were living in the Parish. The largest age group is 30 to 34 years, making up 7.2% of the population. Other significant age groups include 55 to 59 years at 7.1%, 50 to 54 years at 6.7%, and 60 to 64 years at 6.3%. The youngest age group, 0 to 4 years, constitutes 5.4% of the population, while the oldest age group, 85 and over, makes up 4.1%.

2.13 In 2021 there were 2,400 households 34% of which were one-person households and 62.5% of which were single-family households (other household types made up 3.5%).

2.14 The 2021 Census showed that there were 58.9% of residents were economically active and in employment, 2.4% were economically active and unemployed, and 38.6% were economically inactive.

2.15 The 2021 Census also shows that 52.9% of households in Moreton-in-Marsh are not deprived in any dimension while 47.1% of households are deprived in one to four dimensions.

Human Health

2.16 The majority of Moreton-in-Marsh's residents are in good (35%) or very good health (47.7%) with a small proportion (3.3%) in bad to very bad health (0.8%). Information from the 2021 Census indicates that the proportion of the Moreton-in-Marsh's population that is in very good health is slightly lower than the Cotswold (50.4%) average.

Soil

2.17 Around Moreton-in-Marsh, most of the land is classed as Grade 1 and Grade 3 agricultural land, with small areas of Grade 2 agricultural land and non-agricultural land. It is not known whether the Grade 3 land comprises Grade 3a, which is classed as high quality, or the lower quality Grade 3b

Water

2.18 While the majority of the plan area is at very low risk of fluvial and surface water flooding, there are areas of Flood Zones 2 and 3 associated with the River Evenlode which runs through Moreton-in-Marsh. The areas of Flood Zone 3 cover mainly the floodplains of the River Evenlode which includes the centre of Moreton-in-Marsh town. In the face of climate change, the risk of further surface water drainage problems is likely to increase.

Air and Climatic Factors

2.19 Air Quality in the Cotswold Area is generally very good. There is one Air Quality Management Area (AQMA) within Cotswold District at Birdlip, approximately 32km from Moreton-in-Marsh. There are no AQMAs within Moreton-in-Marsh. Air quality monitoring, using a network of diffusion tubes to measure nitrogen dioxide (NO_2) levels, is undertaken throughout the District. The District's air quality monitoring shows that NO_2 levels during 2023 were below the National Air Quality Objective in all locations.

2.20 Climate data are not available at ward level, but within Cotswold District as a whole, reductions in overall carbon emissions of 35.5% were achieved between 2005 and 2022. This reduction is mostly due to progress in reducing emissions from domestic, followed by commercial with minimal progress on public sector and transport. Transport makes the largest contribution to carbon emissions in Cotswold District.

Material Assets

2.21 Moreton-in-Marsh is a thriving market town of 1.5 km². The parish boasts a wide high street lined with elegant 17th and 18th-century buildings made of Cotswold stone, including notable landmarks such as the White Hart Royal and Curfew Tower. The town centre is a hub for community events and a key attraction for tourists. The rural setting offers scenic woods and agricultural fields with numerous public footpaths.

2.22 Employment is supported by High Street businesses, two business parks, the Fire Service College, and medical facilities at North Cotswold Hospital. Education is provided by St David's C of E Primary School. The town has facilities for various sports clubs and social activities, with additional leisure options at the Fire Service College.

2.23 Transport links include a mainline railway station with connections to major cities, bus services to local towns, and extensive footpath and cycle networks. Tourism is vital, with attractions like Batsford Arboretum and the Cotswold Falconry, and accommodation ranging from cottages to luxury hotels.

Landscape

2.24 Much of west Moreton-in-Marsh falls within the Cotswold National Landscape (formally referred to as an Area of Outstanding Natural Beauty, or AONB).

2.25 Moreton-in-Marsh falls within National Character Area 107: Cotswolds. The Cotswolds landscape consists of steep slopes crowned by high, open uncultivated land with increasingly wooded valleys.

Cultural Heritage

2.26 Within Moreton-in-Marsh there are approximately 86 listed buildings, two of which are Grade II* listed while the remainder are Grade II. There are also two Scheduled Monuments.

2.27 There is one Conservation Area within Moreton-in-Marsh: Moreton-in-Marsh Conservation Area, which covers a significant portion of the town centre.

SEA Screening

2.28 An assessment has been undertaken to determine whether the Draft Moreton-in-Marsh Neighbourhood Plan (January 2025) requires SEA in accordance with the SEA Regulations.

2.29 Figure 2.1 overleaf presents the flow diagram entitled ‘Application of the SEA Directive to plans and programmes’ which is taken from the Practical Guide to the Strategic Environmental Assessment Directive, published in September 2005. This is a useful guide when considering whether a plan should be subject to SEA (the Practical Guide has been superseded by the National Planning Practice Guidance; however it still provides a useful and relevant guide to the process to use in making SEA screening decisions).

Figure 2.1: Application of the SEA Directive to Plans and Programmes

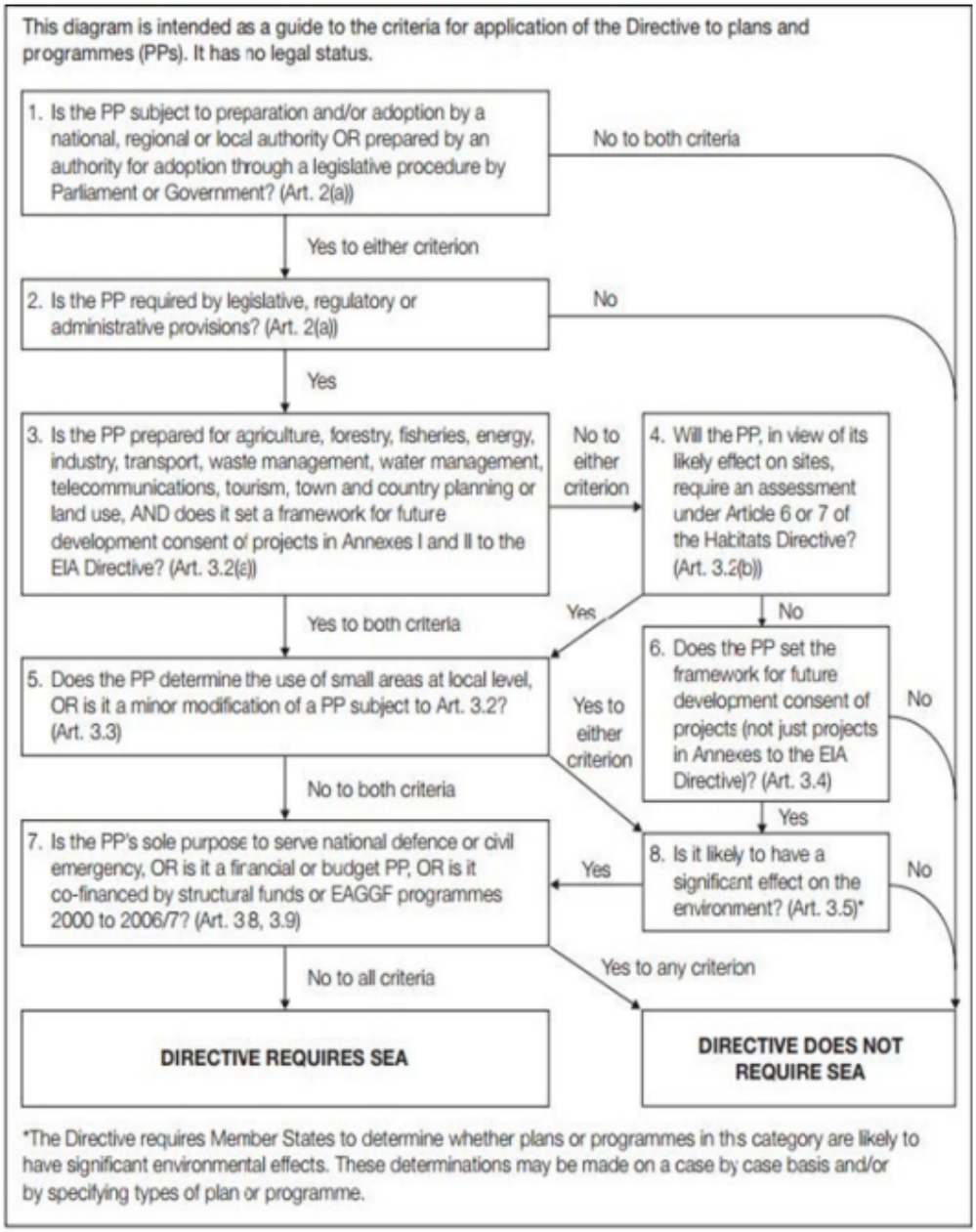

Table 2.1: Application of SEA Directive to the Moreton-in-Marsh Neighbourhood Plan

Stage	Yes/No	Reason
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Yes	The Moreton-in-Marsh Neighbourhood Plan is being prepared under the Localism Act 2011 and will be adopted ('made') by the Local Authority (Cotswold District Council) as part of the statutory development plan. **Move to Q2**
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	The Moreton-in-Marsh Neighbourhood Plan is being prepared under the Localism Act 2011 and in accordance with the Neighbourhood Planning (General) Regulations 2012. However, there is no requirement to produce a Neighbourhood Development Plan; it is an optional plan. Once made it will become part of the statutory development plan. Therefore, it should continue to be screened. **Move to Q3.**
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Yes and No	The Moreton-in-Marsh Neighbourhood Plan is being prepared for town and country planning and land use, but it does not set a framework for future development consent of projects in Annexes I and II to the EIA Directive. **Move to Q4**
4.Will the PP, in view of its likely effect on sites, require an	No	HRA screening of the Neighbourhood Plan has

Stage	Yes/No	Reason
assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))		identified that there are no likely significant effects on Habitats Sites and an Appropriate Assessment is not required. **No: Move to Q6.**
6.Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)	Yes and No	The Moreton-in-Marsh Neighbourhood Plan does not allocate sites for development; however, it includes policies against which proposals for development within the Parish will be assessed. **Move to Q8.**
8.Is it likely to have a significant effect on the environment? (Art. 3.5)	No	See Table 2.2. **SEA IS NOT REQUIRED**

Table 2.2: Likely Significant Effects

SEA Requirement	Comments
The characteristics of the plans and programmes, having regard, in particular, to:	
1. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	Once made, the Moreton-in-Marsh Neighbourhood Plan will become part of the statutory development plan and will guide the delivery of development in Moreton-in-Marsh Parish, including in terms of design. The Moreton-in-Marsh Neighbourhood Plan does not allocate sites for residential or other forms of development. The Cotswold District Local Plan 2011-2031 (adopted in August 2018) allocates new development sites in Moreton-in-Marsh through Policy S18. These include three housing development sites, two established

SEA Requirement	Comments
	employment sites, and one allocated employment development site. The adopted Local Plan is set to deliver 9,671 dwellings over the Local Plan period. In addition, it is expected that a further 233 homes will be released to the market resulting from the net increase in bedrooms in communal accommodation developments over the plan period. In total, the updated housing need aims to deliver 9,904 dwellings. The delivery of 9,904 dwellings will be delivered over the Local Plan period and will provide more homes than the housing need. Therefore, the housing land supply is capable of fully delivering the updated housing need. The emerging Cotswold District Local Plan Partial Update Regulation 18 'Local Plan update and Masterplan' was consulted on between the 1st of February and 7th April 2024.
2. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The Moreton-in-Marsh Neighbourhood Plan has to be in general conformity with the local strategic framework (the adopted Cotswold District Local Plan 2011-2031 (2018) and the emerging Cotswold District Local Plan Partial Update). The Moreton-in-Marsh Neighbourhood Plan must also have regard to the National Planning Policy Framework. The Moreton-in-Marsh Neighbourhood Plan does not have influence over other plans. Once made, the Moreton-in-Marsh Neighbourhood Plan will form part of the statutory development plan for Moreton-in-Marsh and will be used in conjunction with the adopted Cotswold District Local Plan 2011-2031 or the emerging Cotswold District Local Plan Partial Update

SEA Requirement	Comments
	(once adopted) to determine planning applications.
3. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	One of the Basic Conditions which the Neighbourhood Development Plan must meet is to contribute to sustainable development.
4. Environmental problems relevant to the plan or programme.	Baseline information relating to the plan area was described earlier in this chapter. Key issues of relevance to the Neighbourhood Plan are the presence of the Cotswold National Landscape, local biodiversity assets and the variety of designated heritage assets.
5. The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	N/A
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:	
6. The probability, duration, frequency and reversibility of the effects.	The Moreton-in-Marsh Neighbourhood Plan does not allocate sites for housing or other forms of development. The Moreton-in-Marsh Neighbourhood Development Plan covers the period up to 2031. Effects of the Moreton-in-Marsh Neighbourhood Development Plan are expected to be indirect (due to not allocating sites) but long-term and permanent.
7. The cumulative nature of the effects.	Cumulative effects could result from the Moreton-in-Marsh Neighbourhood Plan in combination with development that takes place in the surrounding towns and villages, although the Moreton-in-Marsh Neighbourhood Plan does not

SEA Requirement	Comments
	allocate sites for housing or other forms of development. As the emerging Cotswold District Local Plan Partial Update is still in its development, it is not yet possible to assess with certainty the amount and location of development that may result from the Plan within and close to Moreton-in-Marsh. The Cotswold District Local Plan 2011-2031 (adopted August 2018) allocates a number of new development sites in Moreton-in-Marsh, as detailed above.
8. The transboundary nature of the effects.	The Neighbourhood Plan focuses on Moreton-in-Marsh Parish only. Transboundary effects under the SEA Regulations refers transboundary effects on other EU Member States; therefore they are not relevant to the Neighbourhood Plan.
9. The risks to human health or the environment (e.g. due to accidents).	There are no anticipated risks to human health or the environment from the Moreton-in-Marsh Neighbourhood Plan.
10. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The Moreton-in-Marsh Neighbourhood Plan covers all of Moreton-in-Marsh. The population of the town was estimated to be around 5,015 people as of 2021.
11. The value and vulnerability of the area likely to be affected due to: ■ Special natural characteristics or cultural heritage; ■ Exceeded environmental quality standards or limit values; and ■ Intensive land-use.	Moreton-in-Marsh is bordered by, and includes parts of, the Cotswold National Landscape. There are a number of SSSIs around the plan area and numerous designated heritage features within the plan area.
12. The effects on areas or landscapes which have a recognised national, Community or international protection status.	Moreton-in-Marsh is adjacent to and includes parts of the Cotswold National Landscape.

SEA Screening Conclusion

2.30 A screening assessment has been undertaken by applying the criteria from the SEA Directive and Schedule 1 of the SEA Regulations to determine whether or not the Moreton-in-Marsh Neighbourhood Plan is likely to have significant environmental effects when assessed against the topics listed in the SEA Regulations.

2.31 The Moreton-in-Marsh Neighbourhood Plan sets out a vision and detailed planning policies to shape development in the Parish up to 2031 and decision makers will need to consider the criteria of these policies when determining future applications in the Parish. It does not directly impact on land use through the allocation of sites for housing or other forms of development.

2.32 On this basis, it is considered that the Moreton-in-Marsh Neighbourhood Plan is unlikely to have significant environmental effects and that full SEA is therefore not required.

Next Steps

2.33 This SEA Screening Report will be sent to the three statutory consultees (Natural England, Historic England and the Environment Agency) and will be reviewed as appropriate in light of any comments received.

LUC
March 2025

References

1 Planning practice guidance (PPG). Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities. Available at: https://www.gov.uk/government/collections/planning-practice-guidance

2 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531). It should be noted that the purpose of the amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the European Union. No substantive changes are made to the way the SEA regime operates.

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Rep #1: STRATFORD DISTRICT COUNCIL

Mark Harrison

From: [redacted]
Sent: 17 April 2026 12:51
To: Neighbourhood Planning
Subject: RE: Moreton-in-Marsh Neighbourhood Plan - Reg. 16 Consultation

[redacted]

Good afternoon

Stratford-on-Avon District Council have no comments to make on this Neighbourhood Plan.

Kind regards,

Jessica Underdown
Policy Technician (Planning and Housing)

[redacted] web www.stratford.gov.uk

[redacted]

Rep #2: Resident

Mark Harrison

From: [redacted]
Sent: 17 April 2026 13:21
To: Neighbourhood Planning
Subject: Regulation 16 Consultation - concern

[redacted]

To the attention of the District Council,

I am writing to formally express my significant concerns regarding the increasing volume of proposed housing developments in Moreton-in-Marsh without the infrastructure upgrades by Thames Water.

While I understand the necessity of meeting housing targets, adding further strain to an already fragile system without investment is unsustainable. Residents are already experiencing frequent issues that suggest the current network is at its limit, including:

- Sewer Surcharging and Overflows: Recurrent incidents of sewage backup and the use of storm overflows in our local waterways.
- Low Water Pressure: Noticeable drops in pressure during peak hours, which will only be exacerbated by hundreds of new connections.
- Frequent Pipe Bursts: An aging main system that appears unable to handle shifts in demand or ground pressure.

We need a concrete commitment to infrastructure reinforcement before these new homes are occupied, otherwise local wildlife and waterways are in serious danger from further discharge.

I look forward to your response

[redacted]
Moreton-in-Marsh

Rep #3: NATIONAL HIGHWAYS

Mark Harrison

From: [redacted]
Sent: 20 April 2026 16:35
To: Neighbourhood Planning
Cc: [redacted]
Subject: DL 29/5/26 - Moreton-in-Marsh Neighbourhood Plan - Reg. 16 Consultation - National Highways respon

[redacted]

Mark,

Thank you for providing National Highways with the opportunity to comment on the draft Moreton-in-Marsh Neighbourhood Plan – Regulation 16 Consultation. National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance includes the A46 trunk road and M5 motorway which run some distance west of the Plan area.

We are interested in the traffic impact of any future development proposal and specifically the impact of growth on the continued safe and efficient operation of the SRN. In respect of traffic and transport, Plan polices should ensure development mitigates its traffic impact on the surrounding network which includes reducing the reliance on the private car by requiring development to both safeguard and improve local facilities, services, and sustainable transport options.

Following our review of the draft we are satisfied that the proposed policies within the draft Neighbourhood Plan are unlikely to result in development which will adversely impact the SRN and we therefore have no specific comments to make on the document. This does not however prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.

Kind regards,

Sally

Sally Parish, Spatial Planning, South West Operations
[redacted]

Web: www.nationalhighways.co.uk

Covering: B&NES, Bristol, Cheltenham, Cotswolds, Forest of Dean, Gloucester City, South Gloucestershire, Stroud, Tewkesbury, West of England

[redacted]

Rep #4: Resident

Mark Harrison

From: [redacted]
Sent: 03 May 2026 09:15
To: Neighbourhood Planning
Subject: Moreton in Marsh - Gebe Land car park - Consultation feedback

[redacted]

Dear CDC,
I have fed back locally to the Moreton in Marsh NDP group but sadly they have been influenced by a dysfunctional Town Council in my opinion.

Historically, The Diocese themselves proposed to build a car park on the Glebe Land (Bourton on the Hill road) which would have allowed GCC to bring in much needed parking management in the High Street and side streets. A picture of the proposed car park is below and please note this has pre planning approval with CDC.

The latest NDP consultation output proposes a green field designation on the Glebe Land to effectively kill any car park ideas and that is very wrong in my opinion.

Please DO NOT put a green field designation on the Glebe Land as that field is a very good location for a new out of town car park which the town desperately needs.

Many thanks,

[redacted]



[redacted]

Rep #5: Resident

Mark Harrison

From: [redacted]
Sent: 04 May 2026 13:02
To: Neighbourhood Planning
Subject: Proposed Neighbourhood Plan for Moreton in Marsh

[redacted]

Sirs

You have requested views on the proposed Neighbourhood Plan for Moreton in Marsh to be forwarded to the Independent Examiner for consideration as a next stage of the plan progression to a finished document.

My comments, written as an individual resident of the Town, are my personal views and in these, I do not represent any organisation.

You have not specified how you wish comments to be addressed to you. I have taken the option therefore to write in free text with a summary of major issues and failings within the draft document which you are to examine. This is not exhaustive.

I welcome the opportunity to comment again as part of the process and would repeat my previously held view that I am grateful for the immense amount of hard work undertaken by numerous individuals to date in constructing a document that aims to regularise and formalise guidance that can be used by the town and others to move forward. As one of the then Town Councillors who originally called for a Neighbourhood Plan to be constructed, I do not under estimate the task that others have taken on to reach the stage of the process that is evident in the documentation.

I remain of the view that it is, in my opinion, unfortunate that the process has been, in effect 'taken over' by the current Town Council which is largely not held in good repute by the general population of the town. This has led in part, to the document output being 'hijacked' in part, to meet the agenda set by the Town Council. Whilst there is much to commend the approach taken, for example in the opportunities for the general public to be consulted with in line with the prescribed disciplines of an 'NDP template', the output does not, in my opinion, reflect either some general concerns facing the Town or some of

the specific issues about which the current Town Council has demonstrably failed to address to the satisfaction of a majority of caring residents.

My gravest concern in this process is that the apathy which exists in the town and the sense of resignation which affects attempts to engage the wider community in the debate is likely to damage the credibility of the work completed. One need only examine at a next level of detail, the number of failed attempts to recruit new Town Councillors and the number of Town Councillors who have resigned their posts over the past 5 years to understand why the apathy exists. Until the ethos by which the Town Council operates changes, full engagement of the townsfolk is unlikely and this is and will be to the detriment of the people who have worked so diligently in the NDP project to date and, critically importantly, to the real engagement of the local townsfolk in taking responsibility and ownership of their community for the future.

Whilst I am certain it is not the role of the Independent Examiner in this part of the process to recognise the failings in our community, I do believe it is incumbent upon that role to deeply consider whether this plan has the full engagement of the people it seeks to guide. The role of Cotswold District Council in this is crucial and it should not hide behind apparent transparency in considering whether full and meaningful engagement has been evident and achieved. **Perceived apathy should not be seen as a silent endorsement.**

The plan as presented does little or nothing to address the significant infrastructure development needed for the town. Whilst appreciating that much in this area is outside of the direct control of people to whom this plan is most meaningful, without a significant infrastructure vision and plans in place, (including a clear financial plan), the aspirations of this NDP cannot and will not be fulfilled. The infrastructure issues are numerous and not exhaustively:

a. Schooling and education - the current facility in the town is barely able to cope with the current demands placed upon it. The development and expansion of the town will merely exacerbate the issue unless additional primary and secondary education facilities are factored into the growth currently anticipated. It is not sustainable on any basis to continue the daily transportation students out of the area.
b. Healthcare - the current primary care facilities are struggling to cope with the current population in any way which meets an acceptable

national standard. Add to this the demands of a population whose demographic is currently not well catered for in the area (the elderly and infirm) and whose ability to manage a changed dynamic (younger families coming to the town) must be severely questioned on the numbers requiring care (pre and post natal, maternity, CAMHS, for example). The secondary care facility is at best a token outpost to the major unit in Gloucester and hour away or Cheltenham for intermediate services and some specialities. It is at best a part-time token community service out of step with the current preferred national model of diagnostic hubs and planned treatment centres. NHS funded dentistry in Moreton in Marsh no longer exists

c. Road networks - Moreton benefits from being on a cross road of two major transport arteries - the A429 Fosseway and the A44 east-west route. Both will be positively affected by the completion of the A417 link to the south currently under construction. But notwithstanding, congestion for traffic moving through and around the town is worsening with little apparent forethought on how relief can be achieved or how an expanded town will be able to cope.
d. It is acknowledged that the existing Sewage and Drainage arrangements (provided by Thames Water) are beyond the point of breakdown with urgent upgrades to all water, drainage and sewage facilities required. Thames Water have stated that no upgrade is planned within the lifetime of this NDP. Notwithstanding these points, little or practical consideration has been given to finding a solution to ensure that with the numbers of houses to be built now being proposed, this core service (water, drainage and sewage)will not collapse completely in the town. There is little or no evidence that this plan addresses the wider needs of the town in this area, only an assumption that developers will make a more general contribution to the needs in this area through any CIL funding imposed on their developments. This is in effect, kicking the issue, which is already at a critical point, into 'the long grass'.
e. The lack of a reasonable speed, stable internet infrastructure across the town is the single largest factor in my not considering Moreton in Marsh for the development of my own businesses. This plan does nothing to address the fact that as we move so rapidly into the

digital age, the support structure needed does not exist and is not planned to exist at any time in the reasonable future.

f. Parking continues to be the most sensitive of areas for consideration - what the draft NDP has done is support the current, widely discredited Transport and Parking strategies developed by the Town Council with, at this stage a complete rejection of anything that has challenged and continues to challenge those strategies regardless of the vociferous view expressed by the Town residents over many years and in many different forums. That there is a parking problem in Moreton is not in doubt with none of the various factions, (residents, traders, tourists, shoppers, businesses and occasional pass-through visitors for example) being satisfied with the current situation. The Town Council proposal is to (in essence) remove parking spaces from areas in and around the High Street, replace some of these through the partnership agreed (without a mandate from the residents who are funding it) with GWR at the proposed Transport Hub, plus a redesignation and redesign of some other parking spaces in the Town centre with (the inevitable) support to 'green policies' (such as cycle tracks, public transport usage etc). However, if the town is to develop in size, the numbers of houses, number of businesses, increasing numbers of stay and day tourists, reducing the current inadequate provision for parking will add to the problems already being faced. Similarly, unless a ‘parking strategy’ for the whole town, including the side streets is developed, the problems in the central area will merely be moved to the fringes. These issues are well known and have been well debated for many years. The NDP gives a great opportunity to re-examine the issues in the context of the wider development of the town. Instead, the draft NDP under consideration, merely endorses the poor strategy that the Town Council wish to promote which has already been widely criticised in public meetings and public forums as unworkable and inadequate. This is a huge, missed opportunity for the town.

g. The rejection of the use of the Glebe Field land as a long-term parking solution by the current Town Council is reflected and endorsed by this draft NDP. This is possibly, the most contentious part of the whole plan and is an example of where the NDP as proposed has become a ‘hijacked’ process. The Town Council has consistently failed, over many years, to represent the views of the

residents of the town in respect of this matter and instead, has pursued the disastrous Transport Hub project against the wishes of the people it purports to represent. The Transport Hub project was 'sold' to the residents of the town on a false basis (no mention ever being made of a partnership' with GWR at the time the townsfolk were consulted about raising funding through increasing the precept) and it remains a project which is unfunded with no sustainable plan to develop and which fails to address the issues for the town identified as important. The development of the Glebe Field land (owned by the Diocese of Gloucester) has long been recognised as a catalyst solution for many aspirations the town has held, (addressing the parking problems, creating a 'destination' centre for the development of tourism, central to a proper traffic management for the town etc etc). It is perhaps significant that the owner of the land, the Diocese of Gloucester, has objected to the designation of its land as a protected 'Green' space within the NDP. (First comment on page 20 of the pdf comments document on the NPD website). Perhaps most concerning in the NDP process, the Town Council/NDP steering committee constructing the document have completely failed to address the numerous comments made by residents as a prior part of this process responding instead by a 'stock' response of *"Glebe Field has consistently been identified by the community as an Important Local Green Space and has been included in the Neighbourhood Plan for this reason."* As a former Town Councillor and resident of the town, **I am completely unaware of any evidence that this statement is true.** Furthermore, I am completely unaware of anyone in 'the community' who has seen any evidence to support this view. The comments from the Diocese of Gloucester and the survey they undertook in respect of the potential development of the Glebe would certainly suggest that this expressed view in the draft NPD is not true. This does of course bring into some question whether there are other aspects of the draft document which are similarly based on non-evidenced untruths.

Whilst appreciating that the document as produced only has an applicable life of less than 5 years (up to 2031), as a starting point for what may follow, it is important to set the right tone and get the basics properly grounded. It can also be suggested that the document as produced deals primarily with aesthetics,

(style of building design acceptable for example) and important environmental factors, (use of renewables for example). But the opportunity to do so much more with this plan is one that should not be missed (albeit within the confines of what is ‘allowable’ under current legislation. The comments made above are examples where, I believe, the opportunity to maintain and create something which preserves both the heritage of the area and deal with the inevitable progress that large scale development will engender. Therefore, the failure to address the basic infrastructure elements is an opportunity missed for the future of current residents and those who are fortunate enough to be part of our whole future.

The has been a huge amount of work in getting to this point and I congratulate all involved. But it is surely the role of the Independent Examiner to see where the plan is incomplete, where it falls short on an evidence base and where the consequences of limitations identified are fully understood.



Rep #6: Resident

Consultation Response: Moreton-in-Marsh Neighbourhood Development Plan

I am broadly supportive of the Neighbourhood Plan but wish to raise three significant concerns regarding parking policy and Local Green Space designations, where the plan contradicts community consultation evidence and lacks proportionate justification.

1. Policy 14(c) Contradicts Residents' Expressed Preferences on Parking

The 2021 Residents Survey (835 responses, 35% response rate) provides clear evidence that residents want MORE parking in the town centre, not less:

- **338 residents** requested "Better design and use of existing parking spaces in town"
- **337 residents** requested "More parking capacity in the town centre"

Yet Policy 14(c) proposes to "Remove long-stay parking from the town to a location close to the train and bus stations."

The survey asked no questions about:

- Removing parking from the town centre
- Relocating parking away from the High Street
- Whether long-stay parking causes problems
- Resident support for this relocation strategy

Request: Remove or substantially revise Policy 14(c) to reflect actual community preferences, or provide robust evidence that removing town centre parking serves the community's needs.

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2. Glebe Field (LGS #22) Designation Contradicts Documented Community Preferences and NPPF Criteria

The Glebe Field designation as Local Green Space fails the NPPF requirement that spaces be "demonstrably special to the local community" and appears to be a retrospective measure to block a community-supported car park.

Evidence of overwhelming community support for alternative use:

- 2018 Public Consultation: 87% supported (183/210 respondents) a Glebe Field car park
- 2018 Annual Parish Meeting: Voted 76-18 to support "securing the lease or purchase of the glebe land" for parking
- 2019 Annual Parish Meeting: Voted 23-0 in favour of TRO process acknowledging Glebe as "a good option"
- Diocese Offer: Agreed to build car park at no cost to the town (250 spaces) and lease land to council

The Council itself formally agreed (May 2018) to "work together" with the Diocese to "identify a suitable business model" for Glebe Field car park use, yet this was subsequently abandoned without further community consultation.

Weaknesses in the LGS designation:

- Describes field primarily as a "buffer" between campsite and town (planning function, not community benefit)
- Notes "stock can graze" suggesting private agricultural use
- Provides no evidence of public access or community activities
- Vague justification: "Historic connection to the Parish" without specifics

This retrospective designation directly contradicts:

- Three separate democratic votes supporting the car park
- The plan's own survey showing residents want MORE town centre parking (338 responses)
- The council's own 2018 resolution to work with Diocese on the site
- CDC planning officer's positive pre-application assessment

Request: Remove Glebe Field from Local Green Space designations. The documented evidence demonstrates this land is not "demonstrably special to the local community" as required by NPPF para 107, but rather that the community specifically supported its development for parking to address the town's most pressing concern (per survey: "HGV Traffic and congestion" - #1 concern).

3. Parking Strategy Lacks Proportionate Evidence Base and Realistic Delivery Plan

The plan's parking policies fail to meet the "Basic Conditions" requirement for proportionate evidence and rely on an unfunded proposal:

Missing evidence:

- No parking capacity study or occupancy rates
- No data on long-stay vs short-stay parking patterns
- No traffic impact assessment of removing town centre parking
- No economic impact assessment on retail/tourism
- No viability study of alternative parking locations

Unrealistic delivery assumptions:

- The Transport Hub has **no secured funding** and will require at least **two years of CIL contributions** from CDC. With the impending nationalisation of GWR funding seems even less likely.
- Even if delivered, it provides only **44 additional spaces** for town use (remainder being rail/EV provision)
- The Town Council's recently adopted 'Aspirational Plan' reduces town centre parking from **259 legal spaces (2013) to 132 spaces**

- Net impact: **Loss of 83 town centre spaces** with only 44 replacement spaces (and those unfunded)

This means residents face:

- Immediate loss of 127 spaces if/when town centre changes implemented
- Uncertain timeline (minimum 2+ years) for any replacement provision
- Significant risk the Transport Hub may never be delivered due to funding constraints

The plan proposes removing parking capacity based on a replacement facility that has no funding commitment, contradicting resident requests for MORE parking capacity (337 survey responses).

Request:

1. Remove Policy 14(c) until Transport Hub funding is secured, or
2. Explicitly state that no town centre parking reduction will occur until replacement capacity is delivered and operational, or
3. Commission a comprehensive parking study and revise strategy to align with community preferences for increased town centre capacity.

Rep #7: Resident

Mark Harrison

From: [redacted]
Sent: 13 May 2026 20:33
To: Neighbourhood Planning
Subject: Moreton-in-Marsh Neighbourhood Development Plan (Regulation 16 Consultation)

[redacted]

To Whom It May Concern,

I would firstly like to thank the Town Council, volunteers and contributors involved in preparing the Moreton-in-Marsh Neighbourhood Development Plan. The document clearly reflects a substantial amount of community effort and demonstrates a genuine commitment to preserving the character and vitality of the town while accommodating future growth. The Plan rightly identifies the importance of sustainable development, infrastructure provision, environmental stewardship and the long-term wellbeing of residents.

However, I would like to raise several concerns and recommendations which I believe require stronger emphasis and clearer policy support if the Plan is to successfully meet the future needs of Moreton-in-Marsh as the town continues to expand.

Firstly, there remains a pressing need for a long-term traffic strategy, including serious consideration of a relief or ring road solution to alleviate congestion through the town centre. Moreton's historic layout was never designed to accommodate the current volume of through-traffic, particularly along the A429 and A44 corridors. Congestion not only impacts residents' quality of life, but also affects air quality, pedestrian safety, visitor experience and the attractiveness of the High Street as a social and commercial destination. As additional housing developments are delivered over the coming years, the cumulative impact on traffic movement will become increasingly severe unless strategic infrastructure improvements are planned proactively rather than reactively.

Related to this is the urgent need for improved pedestrian infrastructure, particularly around the bridge near the Co-op and the main road corridor linking newer developments at that end of town. At present, pedestrian connectivity in this area feels fragmented and unsafe, especially for families with pushchairs, elderly residents and those with mobility challenges. A properly designed pedestrian walkway over or alongside the bridge would significantly improve safety, encourage walking instead of short car journeys and better integrate newer housing developments into the wider town. This would strongly support the Plan's sustainability and active travel objectives.

Similarly, there is a clear need for a safe pedestrian crossing and improved parking provision associated with Queen Victoria Gardens. While valuable work has already been undertaken to improve biodiversity and accessibility within the park itself, pedestrian access to the park from surrounding residential areas and the town centre remains challenging. Enhanced crossing facilities would encourage greater use of this important community asset and improve accessibility for children, older residents and visitors alike.

The Plan should also place much greater emphasis on early years childcare provision. Moreton-in-Marsh currently suffers from a significant shortage of nursery places, particularly for children under 18 months, with extremely limited availability thereafter, especially outside standard term-time arrangements. This is becoming an increasingly serious issue for working families and risks

undermining the sustainability of the town as a place for younger households to settle and remain. Housing growth must be accompanied by meaningful social infrastructure, and this should explicitly include provision for nursery and pre-school facilities.

In addition, there is a growing need to address secondary school provision. While primary education is referenced within broader infrastructure discussions, the longer-term educational needs of an expanding population require more strategic consideration. Families should not face increasing pressure to travel substantial distances for secondary education, particularly in a rural area where public transport options remain limited. The Plan should therefore advocate strongly for either expanded local provision or secured partnerships and transport infrastructure that ensure future educational accessibility.

I would also strongly encourage the Plan to prioritise more accessible, year-round green space and walking infrastructure. Although Moreton benefits from pockets of attractive green areas, there remains a shortage of connected, accessible walking routes suitable for everyday recreation, wellbeing and dog walking. The importance of accessible green infrastructure for mental health, physical wellbeing and community cohesion is now widely recognised nationally. Enhancing and connecting green spaces through usable walking routes would provide significant benefits for residents of all ages while also supporting biodiversity objectives already identified within the Plan.

Another issue which deserves greater attention is the visual and functional character of the town centre itself. Currently, parts of the town centre environment feel dominated by surface parking, which detracts from Moreton's identity as a historic market town and weakens the experience for visitors and residents alike. There is a substantial opportunity to rethink the public realm so that Moreton becomes a more attractive, pedestrian-friendly destination with stronger café culture, outdoor social spaces and enhanced support for independent businesses.

However, this must be considered carefully alongside existing and proposed parking strategies. In particular, there is growing concern regarding the proposed "transport hub" at the train station, which many residents feel is poorly conceived in its current form. When considered alongside the proposed changes to parking arrangements within the High Street, the combined effect appears likely to result in a net loss of parking provision overall. This risks increasing pressure on surrounding residential streets, reducing convenience for visitors and potentially harming local businesses that rely upon accessible short-stay parking within the town centre.

In this context, the previous proposal for an out-of-town car park on Glebe land appears worthy of renewed consideration. Relocating some parking pressure away from the centre could create opportunities to transform existing parking-dominated spaces into greener, more welcoming public areas, whilst still maintaining sufficient parking capacity to support residents, visitors and local commerce. Such an approach would support local businesses, improve tourism appeal, encourage longer dwell times within the town centre and create a more distinctive sense of place consistent with the aspirations of the Neighbourhood Plan.

I would also support the creation of a dedicated pedestrian path linking the garden centre with the town itself. At present, walking between these destinations is neither attractive nor particularly safe, despite the relatively short distance involved. Improved pedestrian links would encourage healthier travel choices, reduce short vehicle trips and strengthen connectivity between key destinations.

Healthcare provision also remains a major concern, particularly the absence of NHS dental services within the town. Access to NHS dentistry has become increasingly difficult nationally, but the lack of local provision in Moreton-in-Marsh places significant pressure on residents, many of whom are

forced to travel considerable distances or go without routine care altogether. Given the town's planned growth, the Plan should more explicitly recognise healthcare infrastructure — including dental provision — as a critical component of sustainable development.

I would also strongly encourage the Plan to adopt more ambitious expectations regarding green infrastructure provision within future housing developments. Given the scale of growth anticipated in and around Moreton-in-Marsh, it is essential that developers are required not merely to meet minimum green space standards, but to meaningfully exceed them wherever possible.

There is understandable concern amongst residents that continued large-scale housing expansion risks creating a gradual erosion of the rural character and openness that fundamentally defines Moreton's identity and attractiveness. New developments should therefore be designed in a way that preserves the feeling of a market town set within a rural landscape, rather than contributing to the perception of suburban sprawl or overdevelopment.

Enhanced green infrastructure requirements would help mitigate many of the wider concerns already identified throughout this response. Well-designed green spaces, landscaped buffers, tree planting, community orchards, walking routes and accessible recreation areas can help alleviate pressure on existing parks and amenities, improve wellbeing, support biodiversity, encourage active travel and create a more cohesive relationship between new and existing parts of the town. Importantly, they can also soften the visual impact of development and maintain the distinctive character that makes Moreton desirable both as a place to live and to visit.

The National Planning Policy Framework places significant emphasis on achieving biodiversity net gain, promoting healthy communities and securing high-quality, beautiful places. In the context of Moreton-in-Marsh, this should translate into developments that deliver genuinely usable and attractive green environments rather than small fragmented pockets of landscaping designed simply to satisfy minimum technical requirements.

If substantial housing growth is to continue, developers must play a greater role in ensuring that the town remains visually appealing, environmentally resilient and socially sustainable for future generations. Stronger green space expectations within the Plan would provide reassurance to residents that growth can occur without sacrificing the qualities that make Moreton unique.

Overall, I believe the Neighbourhood Development Plan provides an important foundation for shaping Moreton's future, but it must be strengthened to ensure infrastructure, accessibility, healthcare, education, green space and transport improvements keep pace with housing growth. Without stronger commitments in these areas, there is a real risk that the town's quality of life, community cohesion and historic character will gradually erode under increasing pressure.

I hope these comments are received constructively and can contribute positively to the ongoing development of the Plan.

Yours faithfully,

[redacted]

Sent from Outlook for Android

Rep #8: Resident. (n.b. CDC sent appendices).

Mark Harrison

From: [redacted]
Sent: 21 May 2026 12:40
To: Neighbourhood Planning
Subject: Moreton Neighbourhood Plan

[redacted]

Hello,
I would like to comment on the proposed Neighbourhood Plan for Moreton-in-Marsh.

First, thanks to everyone who has worked so hard on this document, much appreciated.

May I bring to your urgent attention that some Appendices to the Neighbourhood Plan are missing from certain printed and digital versions. Page 3 lists Appendices A to H, but I can no longer find Appendices E to H.

I wish to comment on Appendix G, the Greenway documents. Moreton-in-Marsh badly needs upgraded facilities for Active Travel. The proposed East Moreton Greenway would provide a very low cost solution, by signposting an existing network of paths. I strongly support this. Walking and cycling would be easier and safer. Fewer people would use cars to travel around town.

Please will you replace the missing Appendices, so they appear in all versions of the Neighbourhood Plan. It's too hard to find Appendix G, so please will you provide a link from page 58, maybe from page 18 as well.

I am also writing in support of the The Glebe Land, as a future car park for Moreton-in-Marsh. Moreton's businesses have to compete with places like Chipping Norton, which has a huge, free public carpark.

The Glebe Land is a field alongside the A44 Bourton Road, opposite the Wellington Aviation Museum and extending towards Moreton High Street. The land is owned by the Church of England. I understand that some years ago, the Church offered to donate the land to Moreton-in-Marsh, for car parking. I feel this offer should be explored further.

Regards,
[redacted]

Rep #9: Resident

Mark Harrison

From: [redacted]
Sent: 26 May 2026 11:43
To: Neighbourhood Planning
Subject: Moreton Neighbourhood Plan

[redacted]

Having read the relevant paperwork and background to the Plan I fully support the aspirations as outlined. A resident since 2006 and regular visitor to the area from 1964 I have witnessed significant changes to the town many not to the good.
The High Street has declined and is less accessible with long term High street parking reducing the foot fall in shops, certainly in the sixties Moreton had a wide range of shops along the High Street most have now gone. Infrastructure is now a major concern - schools provision, sewage system , GP practices still largely the same size since 2006 and the Four Shires medical centre now is inadequate to meet the needs of Moreton and the locality. I hope serious note is taken of the Plan.

[redacted]

Rep #10: Resident

Mark Harrison

From: [redacted]
Sent: 26 May 2026 18:28
To: Neighbourhood Planning
Subject: Regulation 16 Representation – Moreton-in-Marsh Neighbourhood Plan

[redacted]

Dear Sir or Madam,

I am writing to submit my representation on the Moreton-in-Marsh Neighbourhood Plan as part of the Regulation 16 consultation.

I support the intention of the Neighbourhood Plan to manage development in a sustainable way. However, I believe the Plan must go further in recognising that Moreton-in-Marsh already faces significant infrastructure deficits. Further large-scale development would be unsustainable unless critical infrastructure is delivered first. My comments relate to the Basic Conditions, particularly sustainable development, general conformity with the Local Plan, and adequacy of the evidence base.

1. Health Infrastructure The town has extremely limited healthcare capacity. There is only one dental practice serving more than 5,000 residents, with little or no NHS availability. GP services are already stretched. There is no committed plan for expanded provision despite substantial population growth since the 2011 Census. Development without confirmed healthcare expansion would not meet national policy requirements for adequate health infrastructure.

2. Traffic, Air Quality and Pollution The A44 and A429 already carry heavy traffic and dissect the town, causing congestion, pollution and safety issues. Additional development would worsen these problems unless significant mitigation is secured. This raises concerns regarding sustainable transport and environmental impacts.

3. Education Capacity Local schools are already constrained, and there is no committed plan for expansion. Without additional school places, further housing growth would not be deliverable in a sustainable way.

4. Retail and Leisure Provision The town centre has an increasingly limited retail mix, with a proliferation of cafés and a lack of essential retail, leisure facilities, gyms or youth amenities. Sustainable development requires a balanced and functional town centre.

5. Rail Capacity The rail service is already close to capacity at peak times. Additional housing will place further pressure on a line with limited ability to increase frequency due to infrastructure constraints.

6. Water and Wastewater Infrastructure Thames Water has indicated that it cannot fully service existing demand. Wastewater capacity and water pressure issues are well known. Adding more homes without confirmed upgrades would be unsustainable and contrary to national policy.

7. Housing Design and Local Vernacular Any new development must reflect the local Cotswold vernacular in materials, scale and layout. Recent approvals outside the settlement boundary have not always met this standard. Stronger design requirements are needed.

8. Location of Development Development should be focused on areas with direct access to the A-roads. Proposals accessed via narrow rural lanes are unsuitable and would create safety and traffic issues.

Overall Position

I support the Neighbourhood Plan's intention to shape development, but it must be strengthened to ensure that no further large-scale housing is supported until critical infrastructure across health, transport, education, water and utilities is demonstrably deliverable. This is essential to meet the Basic Conditions and ensure Moreton-in-Marsh remains a sustainable and functional town.



Moreton In Marsh

Rep #11: HISTORIC ENGLAND

Mark Harrison

From: Stuart, David [redacted]
Sent: 27 May 2026 11:44
To: Neighbourhood Planning
Subject: Moreton-in-Marsh Neighbourhood Plan - Reg. 16 Consultation

FAO Mark Harrison

Dear Mark

Thank you for your Regulation 16 consultation on the submitted version of the Moreton-in-Marsh Neighbourhood Plan.

I can confirm that there are no matters associated with the Plan upon which we wish to comment.

Kind regards

David

David Stuart | Historic Places Adviser
[redacted]
Historic England | South West
[redacted]
https://historicengland.org.uk/southwest

Historic England

Ensuring our heritage lives on and is loved for longer.
historicengland.org.uk

[redacted]

Rep #12: NETWORK RAIL

Mark Harrison

From: Grace Lewis [redacted]
Sent: 27 May 2026 15:52
To: Neighbourhood Planning
Subject: Network Rail comments Moreton-in-marsh NDP

[redacted]

OFFICIAL

Network Rail
[redacted]

Date: 27 May 2025

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)
PROPOSAL: Moreton-in-marsh Neighbourhood Development Plan.

Dear Mark,

Thank you for consulting us on the Moreton-in-marsh neighbourhood development plan. This email forms for the basis of our response.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.

Level Crossings

Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.

There is one level crossing within the plan area that could be affected:

1. Moreteon-in-marsh Public Footpath Level Crossing

Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.

Level crossings can be impacted in a variety of ways by planning proposals:

- By a proposal being directly next to a level crossing
- By the cumulative effect of development added over time
- By the type of crossing involved
- By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing
- By developments that might impede pedestrians ability to hear approaching trains
- By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs
- By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing
- By any development or enhancement of the public rights of way

It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage at the level crossing in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-

- (Schedule 4 (j) of the Town & Country Planning (Development Management Procedure) Order, 2015) requires that *"…development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway"* (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval.

We trust these comments will be useful in the preparation of the forthcoming plan documents.

Yours Sincerely,

Grace Lewis MRTPI
Town Planner
Network Rail
[redacted]
www.networkrail.co.uk/property

Marrons

Moreton-in-Marsh Neighbourhood Plan Regulation 16 Consultation, Representations on behalf of Catesby Estates (27th May 2026)

1. Introduction

1. Catesby Estates has instructed Marrons to submit representations to the Moreton-in-Marsh Neighbourhood Plan (MIMNP) Regulation 16 Consultation.

2. The MIMNP has been reviewed against the 'basic conditions' and legal requirements set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), and associated requirements of the National Planning Policy Framework (NPPF)[1], notably NPPF paragraph 38, and National Planning Practice Guidance (NPPG) ('Neighbourhood Planning')[2].

3. The representations are submitted within the context of Catesby's land interests east of Evenlode Road, Moreton-in-Marsh, which is currently subject to an outline planning application for up to 110 new homes and associated infrastructure (Cotswold District Council reference 25/04041/OUT[3]).

4. In summary, the following policies are currently in conflict with basic conditions (a) and (d) since they are not informed by up-to-date evidence (a requirement of national planning policy) and therefore do not contribute towards the achievement of sustainable development.

   - Policy Three: Housing Mix.
   - Policy Four: Affordable Housing.
   - Policy Ten: Principal Residence Housing.
   - Policy Nineteen: Development Boundary.

5. Detailed justification is provided in section 2.

[1] Ministry of Housing, Communities and Local Government, December 2024 version.
[2] Ministry of Housing, Communities and Local Government, published 6th March 2014, last updated 25 September 2020.
[3] 25/04041/OUT | Outline planning application for erection of up to 110 new dwellings, public open space, landscaping, sustainable drainage system (SuDS) and creation of associated vehicular access point to Evenlode Road and other associated infrastructure, with all matters reserved except access into the Site | Land East Of Evenlode Road Moreton-In-Marsh Gloucestershire (accessed May 2026).

2. Detailed justification

Policy Three: Housing Mix

6. The Housing Needs Analysis (Appendix H) referred to in the policy is not included in the consultation document and not available for review and comment. This needs to be included and published for consultation to support the justification for this policy, to ensure that it meets basic condition (a). Basic condition (a) requires a neighbourhood plan to have regard to national policies and guidance. National Planning Policy Framework (NPPF) paragraph 32 requires that *"all policies should be underpinned by relevant and up-to-date evidence".*

7. If the evidence relied on is the Moreton-in-Marsh Housing Needs Survey Report (GRCC, May 2021) then that report makes clear at paragraph 1.3 that *"the survey is valid for up to 5 years from the survey (February 2020)."* The validity of that the survey therefore expired in February 2025 so needs to be updated. An up-to-date housing needs survey is also necessary to support a plan which contributes towards the achievement of sustainable development – of which meeting housing needs is an important component – to meet basic condition (d).

Policy Four: Affordable Housing

8. Policy Four requires that affordable housing should reflect local need with reference to Appendix H, Morton-in-Marsh Housing Needs Assessment. However, as explained in response to Policy Three, this evidence is missing from the consultation and so conflicts with basic condition (a) and NPPF paragraph 32, which requires plans to be underpinned by up-to-date evidence. The validity of the 2021 Housing Needs Survey Report expired in February 2025.

9. A further issue regarding Policy Four is criteria (b), which states that *"Affordable homes will be prioritised for households with a strong local connection for the parish of Moreton-in-Marsh…".* This policy does not accord with national policy and legislation, conflicting with basic condition (a). National policy, guidance and legislation places responsibility on the allocation of affordable housing on the relevant local housing authority, as set out in Allocation of accommodation: guidance for local housing authorities in England (MHCLG,

1st April 2026)[4]. Moreton Town Council does not have statutory powers to direct the allocation of affordable housing. Responsibility sits with Cotswold District Council who use the Homeseeker Plus choice-based lettings scheme[5].

Policy Ten: Principal Residence Housing

10. Policy Ten prevents any new open market housing unless there is a restriction to ensure its occupancy as a principal residence only. The aim of the policy is to prevent new homes being built for holiday accommodation and second homes. However, this policy is not underpinned by relevant and up-to-date evidence, in conflict with NPPF paragraph 32 and therefore basic condition (a).

11. The extent to which open market homes are being used for holiday accommodation and second homes is not evidenced. The Action on Empty Homes analysis referred to in Footnote 34 is not available as part of this consultation (there is no hyperlink against which to review the 2024 figures reference). Furthermore, any analysis of empty homes is distinct from an analysis of whether such homes are being used as holiday accommodation or as a second home. Homes may be empty for other reasons, for example because they are in need of repair or refurbishment, awaiting resolution of probate or inheritance or the owner may have moved into care. The number of empty homes does not infer a corresponding number of holiday accommodation and second homes to justify Policy Ten.

12. Neighbourhood plans which have adopted similar policies have much more detailed evidence underpinning them. For example, the St Ives Neighbourhood Plan in Cornwall had a second homes policy informed by local data, the Census and specific research undertaken by the University of Exeter. No comparable evidence is available to support the MIMNP.

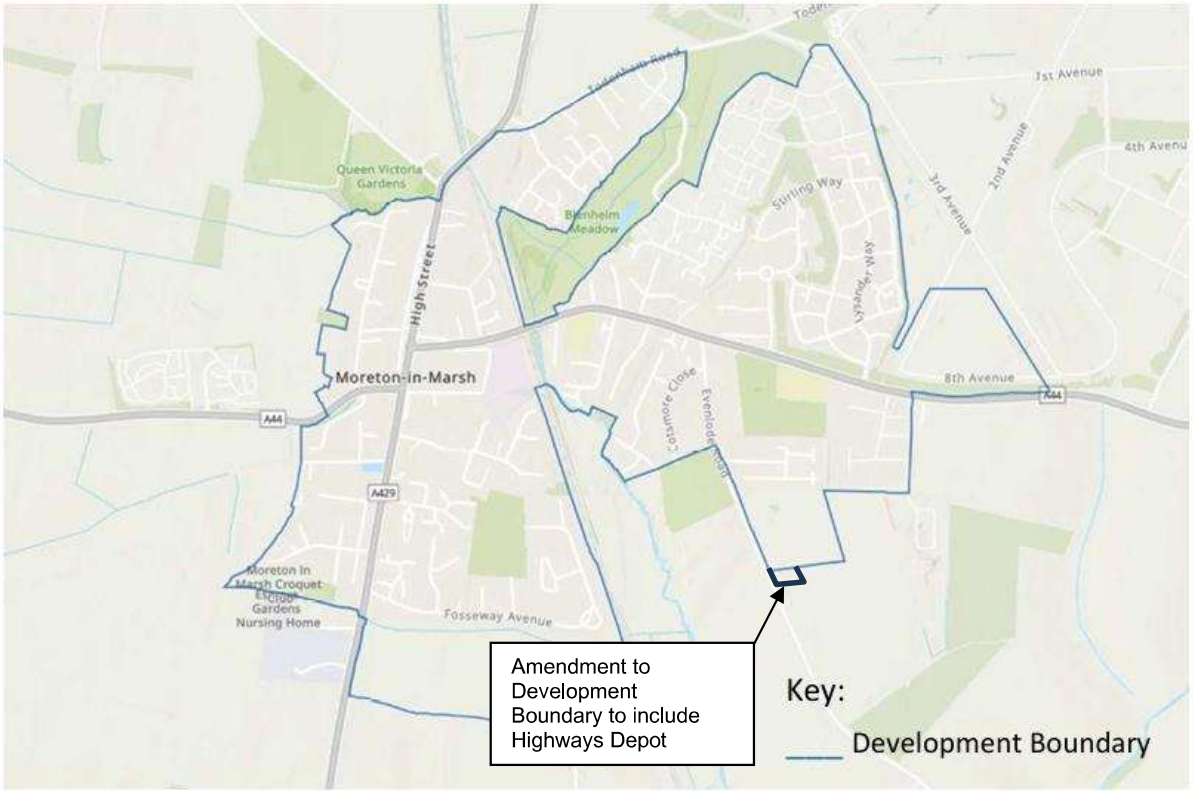
Policy Nineteen: Development Boundary

13. The Development Boundary needs to be amended to ensure that it is up-to-date and reflects the extent of the existing built-up area in order to meet the requirements of NPPF paragraph 32 and basic condition (a). On Evenlode Road, the boundary needs to include

[4] Allocation of accommodation: guidance for local authorities - Download this guidance - Guidance - GOV.UK (accessed May 2026).
[5] Apply for housing - Cotswold District Council (accessed May 2026).

the Gloucestershire County Council Highways Depot which adjoins the Backhouse housing scheme (21/02766/REM). This is all developed land in operational use which forms part of the built-up area. Figure 1 shows the amendment that is required.

Figure 1 Amendment to Development Boundary



3. Response to other content in the MIMNP

Footnotes and hyperlinks

14. Various hyperlinks are included as part of the MIMNP's footnotes, however, these are not available or accessible as part of the consultation document.

Missing appendices

15. Appendix F, G and H are missing from the Regulation 16 draft and need to be published as part of the consultation.

4. Summary

16. Policies Three: Housing Mix, Four: Affordable Housing. Ten: Principal Residence Housing Need and Nineteen: Development Boundary to be revisited to ensure they meet the requirements of basic conditions (a) and (d), having regard to national planning policy and contributing towards the achievement of sustainable development respectively. The lack of up-to-date evidence to support these policies is the overarching issue.

17. Footnote hyperlinks need to be accessible, and missing appendices F, G and H provided for consultation.

Rep #14: Resident

Mark Harrison

From: [redacted]
Sent: 28 May 2026 15:08
To: Neighbourhood Planning

[redacted]

Before more houses are built I would like to know that the facilities they will require have been fully considered for example Access to NHS dentists Access to Doctors Primary school places
Activities- youth clubs Guides etc
Traffic flow through the main streets
Where are all the new residents going to work These are all in addition to water, sewage etc [redacted]

Rep #15: NATURAL ENGLAND

Date: 29 May 2026
Our ref: 546556
Your ref: Moreton-in-Marsh Neighbourhood Plan

Mr Mark Harrison
Cotswold District Council

BY EMAIL ONLY
neighbourhood.planning@cotswold.gov.uk

Dear Mr Harrison

Moreton-in-Marsh Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 16 April 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact:

Yours sincerely
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The Magic[1] website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from the Association of Local Environmental Records Centres .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here[2]. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here[3].

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the Magic[4] website and also from the LandIS website[5], which contains more information about obtaining soil data.

Natural environment issues to consider

The National Planning Policy Framework[6] sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance[7] sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

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[1] http://magic.defra.gov.uk/
[2] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[3] https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making
[4] http://magic.defra.gov.uk/
[5] http://www.landis.org.uk/index.cfm
[6] https://www.gov.uk/government/publications/national-planning-policy-framework--2
[7] http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here[8]), such as Sites of Special Scientific Interest or Ancient woodland[9]. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed here [10]) or protected species. To help you do this, Natural England has produced advice here[11] to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see Guide to assessing development proposals on agricultural land [12].

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the National Planning Policy Framework. If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory Biodiversity Metric may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the Small Sites Metric may be used. This is a simplified version of the statutory Biodiversity Metric and is designed for use where certain criteria are met. Further information on biodiversity net gain including planning practice guidance can be found here

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's Green Infrastructure Framework sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance[13]).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

[8] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[9] https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences
[10] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[11] https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals
[12] https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land
[13] https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory Biodiversity Metric and is available as a beta test version.

Rep #16: Resident

Mark Harrison

From: [redacted]
Sent: 29 May 2026 16:07
To: Neighbourhood Planning
Subject: Moreton-in-Marsh NDP Consultation 16

You don't often get email from nick@loatdavies.com. Learn why this is important

Dear Sir/Madam,

I am writing in response to the consultation on the Moreton-in-Marsh Neighbourhood Development Plan.

I am broadly supportive of the policies in the Plan, particularly those which seek to protect the rural setting, landscape character, biodiversity, heritage, green spaces and important views of Moreton-in-Marsh. These are central to the character and quality of life of the town and should be given significant weight in future planning decisions.

I particularly support the emphasis on protecting the Cotswold National Landscape and the surrounding countryside. Moreton's setting is one of its greatest assets, both for residents and visitors, and future development must not be allowed to erode the rural character of the parish or the views and landscape features that connect the town to the wider Cotswolds.

I also strongly support the designation and protection of the proposed Local Green Spaces [Policy 15], including Glebe Field. These spaces are important not only visually, but for recreation, biodiversity, wellbeing, drainage, and maintaining the distinct identity of different parts of the town. Once such green spaces are lost to development, they cannot realistically be replaced.

I welcome the Plan's focus on active travel, walking and cycling. In my view, congestion in Moreton is a greater problem than parking. The town is compact: no residential area is more than around 1.5 miles from the High Street, and many everyday journeys into the centre are therefore walkable for a large proportion of residents. While parking provision should be managed sensibly, it should not become the dominant consideration or be used to justify undermining green space, townscape quality, or the shift towards more sustainable movement. The priority should be to reduce unnecessary car journeys within the town, improve safe walking and cycling routes, and make it easier for residents and visitors to access the High Street without adding to congestion on the A429 and surrounding streets.

Overall, I support the Plan and urge that its environmental, landscape, green space and active travel policies are retained and applied robustly.

Yours faithfully,

[redacted]

This document is very similar to the one provided as feedback directly to the Moreton-in-Marsh Neighbourhood Development Plan Group. The group comprising of Councillors, (some with interests for the Redesdale Hall) and Members of the public, 2 of whom are trustees of the Redesdale Hall. Very few of my initial comments have been acted upon, so I want to reiterate my points where necessary.

NDP Document

Approach to Sustainable Development page 22. 2nd paragraph discussing leisure facilities, where the document states “there is no secondary school nor are there leisure facilities available to the public”. This statement is incorrect, because the Fire College actually has a gym, a swimming pool, and tennis courts available to the public, only it is not sufficiently advertised and obviously the community are not aware. The council could assist with the promotion of these facilities to enable a healthier population within Moreton. There are free to use, open air gym facilities at the London Road Skatepark for use by the public and it has been highlighted many times to the council that there is no signage at the facility encouraging public use. I believe the council could, if they were serious do more to promote a healthy lifestyle.

Profile of the community today

On page 12 of the NDP plan, the profile of the "Tenure" provides a comparison between Moreton-in-Marsh, Cotswold and England. It does not state where the data is from, but I assume 2021 Census.

The comparison data referenced above, shows Moreton specifically has a higher proportion of Social rented property than either Cotswold area or England.
I disagree with your conclusions. If you are referencing this data, where is the evidence that a higher proportion of socially rented property is actually required in Moreton when this data shows the exact opposite? I can only assume the evidence is anecdotal, because collected data suggests there is no actual requirement to increase socially rented properties in Moreton. The data shows more socially rented properties are indeed required, but elsewhere in the Cotswolds or even England, but not in Moreton.

The tenure data actually implies there is a need for a higher proportion of privately rented properties within Moreton, however the objective of **NDP policy 10** may potentially curtail private rental properties.

Although the following data seems to have been removed, its relevance is still appropriate.
GRCC (HNSR) 2021, Table A7 Housing tenure, shows 650 responses, 10% socially rented and 6% private rented. This data also shows private rental being 37.5% of all available rented property.
The GRCC (HNSR) 2021 (Para' 6.5) references the 2011 Census data, where it also shows over 16% of rented property as either "private" or "other rented" and it can be calculated 36% of all available rented property is "private" These two sources imply the percentage of privately rented property available in Moreton, is reasonably constant over the ten-year period.
Even though 55% of respondents support Government Starter Homes (20% discount on market value for under 40's), there is no way of ensuring potential buyers can raise funds to complete a purchase.

I disagree with policy 10. I understand what policy 10 is trying to achieve, however it is far too over reaching and will have a detrimental impact on the much-needed private rental sector. The proposals must recognise, not all tenants want or are entitled to, a socially rented property.

Policy 10.

I disagree with the reasoned justifications and there is no evidence to support the policy.

The stated justifications are not for Moreton-in-Marsh, they are for the Cotswold District as a whole. Para' 49 references analysis by "Action on Empty Homes" as 3,409 empty homes in Cotswolds, it cannot identify how many were directly in Moreton.
The calculation of 1 in 17 is also inaccurate, as the referenced document states there are 46,109 total homes and 3,409 empty homes, realising a ratio of 1:13.5 empty homes to total homes.
Using the 2021 Census data of 2400 households within Moreton and using the worst-case calculation above of 1:13.5 empty homes, equates to 178 potentially empty homes in Moreton. According to the 2019 CDC data there are 2470 dwellings in Moreton, this would then equate to 183 potentially empty homes.
The closest and arguably most accurate comparison available, is between the 2019 CDC data and the 2021 Census data, which shows 2470 dwellings and 2400 households respectively. The comparison provides information to show 2400 households out of the potential 2470 dwellings, responded to the 2021 Census, which implies only 70 dwellings were not occupied in Moreton at the time of the 2021 Census, or only 2.8% empty homes.

The reference data does not identify the number of "second home" responses nor the tenure of the non-responding homes.

Policies 3, 4, & 10. May have undesirable consequences, the policies are written with the intent to achieve a balanced mix, however, what they seem to ignore is the affordability factor.

When affordable homes are built, some the homes are "purchased" by housing associations, some are fully rented and some part buy, part rent. The recent market situation has seen housing associations refuse to purchase the homes. The developers are then left with affordable homes to sell, but even at discounted values, they are too expensive for first time buyers.

The GRCC (HNSR) 2021 clearly identifies the low uptake of affordable homes and the difficulties of purchasing with a mortgage.
No local policy can overcome this directly. If local people cannot afford to buy and housing associations do not purchase to rent, then the only option is investors for private rental. Private rentals are expensive, but for some, there is presently, no alternative. I disagree with implementing these policies in this way without consideration to the recognisable undesirable consequences.

Policy 1 (d)

If the development is conditional on an energy assessment, there should be an expectation for a minimal designed EPC rating. Maybe "B"?

Policy 4
Reasoned Justification for Policy Four

The only "justification" is identified in paragraph 25, which "identifies affordable housing needs for the District" I agree with this statement, **however I do disagree** with their conclusion that the is a need within Moreton. As I've stated above, On page 12 of the NDP plan, the profile of the "Tenure" provides a comparison between Moreton-in-Marsh, Cotswold and England. The comparison shows the need for more social housing within the District, but Moreton actually has a higher percentage of social housing than both the District, and England as a whole. Therefore, the conclusion and justification are incorrect.
Justifications 26 and 27 are not justifications for the policy, they are requirements for persons to be accepted for social housing.

Policy 6

Visitor Parking

I disagree with elements of this policy
The average walking speed of an adult is deemed to be between 3.2 and 4mph. A 15mins walk is equivalent to approximately 1 mile.

Policy 6 (g), Implies even a single residence or conversion within a 1-mile radius from the town centre, should explore the provision of public car parking. What is an applicant to provide as evidence?

The first statement below the coloured sections of the documented section, states the objective of policy six is to reduce on-street parking in residential areas, but **Policy 6(e**) states "visitor parking can be off-street or on-street", this implies a contradiction. I would expect on-street parking to be classified as the exception.

Policy 8. (b)(3)

I do not believe this section is clear and will be ineffectual. I agree traffic and transport assessments are required; however, any substantial development should also consider the impact vehicles will have specifically on parking within the town centre.
Outside the 15-minute walking time, it seems a developer does not have to consider the impact additional vehicles parking in the town will have on centre parking. The further away from the town centre a development is built, the more likely a resident will use their car to travel to town, therefore "parking" not just traffic in the town, in these circumstances should be a consideration at planning stage.

Policy 9. (c)

I disagree with this policy and reasoned justification I do not believe any sensible data will be provided. Phasing larger developments can be more detrimental to the locality through disruption (e.g. Spitfire), however the justification (**48**) implies developers consider surrounding parish facilities. Are developers allowed to include facilities available in neighbouring parishes, potentially offsetting any need to improve Moreton-in-Marsh facilities? This potentially opens up the "parish" facilities much wider and I recommend removing the words "and surrounding parishes"
How does a developer provide proof of adequate services with no adverse impact on soft infrastructure and over what timescale? I do not believe this can be administered by the council. Any evidence provided may not be independently verified or just anecdotal. Although required, I do not believe any sensible data could be provided.

Policy 10

I have stated above, I do not agree with this policy because it may have unexpected consequences as stated above. The council are actively promoting the tourist industry and increase to visitor numbers, but on the reverse, they are limiting the potential accommodation available to visitors, this does not make sense.

Policy 11 (b) 1. & Policy 13 (b) 1

I do not agree This policy may be detrimental to business in Moreton. The change of use resulting in the loss of employment area potentially requires the property to be marketed for a minimum of 12 months. I believe these policies will potentially have empty shops on the High Street. As an example, Jon Fox Antiques on the High Street has just been sold subject to contract. The property comprises of a shop area, two further floors of shop space, a studio, a garage and land with development potential.
This policy states, effectively this new owner will not be able to develop this site, even though it is far too large for most businesses these days. Is the purchaser expected to market the property (for an exorbitant price so it doesn't sell) for 12 months before being allowed to alter or just decide not purchase at all? Either way, the shop will potentially be empty.
The Moreton Means Business event held 24th April 2019, also suggests restricting change of use may increase the number of empty spaces in the town.

Policy 14 Contributions to local priorities

Policy 14(a)

"Refurbishment, including Public Realm Improvements around the Redesdale Hall".

I disagree with this. This requirement is too specific and nowhere within any documentation has the specific requirement "around the Redesdale Hall" been detailed. I believe this requirement has been added by some in the NDP group with Redesdale Hall "interests" and should be removed. The potential for this "improvement" is included within the council's Transport Strategy document. "Moreton-in-Marsh High Street Refurbishment improvements", encompasses all of the High Street and not just "around the Redesdale Hall", therefore any funds should be directed to improvement on any part of the High Street.
It must be noted that the Redesdale Hall is owned by a private charity, it has not provided any business case to the council or to the community and therefore altering the public realm to incorporate and assist a private business without a complete and thorough understanding is inappropriate.

Policy 14. (c)

"**Remove long-stay parking from the town to a location close to the train and bus stations**."

I disagree with this because this is inaccurate, Moreton Means Business Event 24th April 2019 and the Summary of feedback from 1st NDP Consultation 2nd February 2019 neither of which document the desire to move long-stay parking to the station. There were comments on how such a parking scheme would work, but this particular desire was not indicated.
It should also be noted that the planning application submitted on behalf of the council and GWR, only provides an additional 43 car parking spaces to those presently in place. The council's Transport Strategy document has identified much higher numbers of parking spaces to be removed from the High Street, believed to be a potential deficit of over 100 spaces. The business Event 2019, and the NDP feedback 2019 recognise the need for car use and parking. The Residents Survey Report 2022 also requests additional parking in the town, all of which seem contrary to the planned council Strategy.
There has been no specification to remove parking from the High Street towards the Station, it is only because the Council have entered an agreement with GWR to increase the parking at the station that this has been included, however, the expectation is that the additional parking will be for rail travellers, and not necessarily for short stay tourist visitors. Again, this is an expression introduced by council members, not necessarily the community as a whole.
The **Community Aspiration 2**, is also questionable, where is the evidence? The business Event 2019 recognised the need for parking for tourists and visitors alike and the business survey January 2022 identified 74% of businesses deemed tourism as very important to Moreton-in-Marsh. i.e. where do overnight visitors park? Residents have indicated the need for permits, but where has "preventing overnight parking" come from? No evidence has been presented to suggest this?

In General

Within much of the documentation, there appears to be an acknowledgement that Moreton-in-Marsh is lacking of "things-to-do" by business and the wider community, however, this policy provides no direction on how to enhance this. Leisure facilities and interests are seemingly ignored; no funding is requested for improvement. Interestingly the Redesdale MUGA is deemed worthy of protection, but it is in a dilapidated state and the council have no coherent plan for the area or its future use.

How does this plan or a policy intend on improving or providing vibrant facilities? Is the council considering on providing "things-to-do" or is there a plan to encourage business to invest in the "interests" of the community?

The Moreton Means Business Event 2019 highlighted tourism as important to Moreton-in-Marsh but it also highlighted the necessity to offer something to differentiate itself. Where is the differentiator in the plan?

Policy 15. Local Green Spaces (LGS)

I do not agree with all of the LGS. No's **#13a, #13b & #13c** are already developed and owned by the council. They should be removed from this list.
The Bowls Club **(#13c)** is developed with a large clubhouse and holds a 99 year lease dated 2010 from the council. The Croquet Club **(#13b)** holds a 50 year lease from 2020. Both clubs have a strong membership following.
The Redesdale MUGA **(#13a)**, is in a dilapidated condition and has not been repaired by the council for years, hence creating its own "eyesore". If the council consider this area worthy of preservation, maybe they should do something to preserve it.
At the council meeting in August 2025, the council voted to approach the developers of the adjacent land to establish whether there would be any mutual benefit in working together regarding the MUGA area. Is the council now trying to reverse this decision? Has the council actually contacted the developer?

The 2022 **Residents Survey Results Report- Natural and Built Environment**, highlights "Play equipment and facilities for older children had the lowest ratings". **Q47**. Facilities for teenagers (13+) and Adult outdoor gym equipment were rated the lowest overall.

LGS (#19) Glebe Field this field is owned by the diocese and in the past has been contacted by members of the council in trying to establish whether the area could be utilised as a carpark for Moreton-in-Marsh.
As the Transport Hub development will under-deliver on the total additional carparking spaces with a maximum of 43 and with the council adopting its Transport Strategy document which creates a deficit of potentially 100 car parking spaces in the centre, it seems only logical to keep the options for this land open, especially as the business community and general community recognise the importance of tourism.
Including it in the **protected views** is also somewhat erroneous, as the stated reason could apply to any field surrounding Moreton-in-Marsh.

There are a couple of local spaces that have not been included as protected areas;

There is a triangular area between 19-21 Sunderland Road and 19-21 Mosedale, this area was specified as an area for interesting species, it can be identified underneath the legend for "Moreton Park Green Space -1" on the South East map.
The greens area the full length of Errington, between Errington and London Road, all of the trees in this area have individual Tree Preservation Orders (TPO's). Identified underneath the legend "Buffer between Moreton Park & A44" on the South East map.

Other documentation

Vision & Objectives Survey February 2023

I note the very last line of the summary document state " Create a more connected parish for residents and visitors alike, limiting the need for vehicular travel within the town and offering a genuine choice of transport"

Limiting the need for vehicular travel will not happen by removing parking, or not offering enough spaces. Offering a genuine choice is not only walking or cycling, the plan does not address how the “genuine choice” will be achieved.

Although it is government policy to encourage "active travel" the National Cycle routes that traverse Moreton do need upgrade and the local community recognise and understand the cycle routes in particular are hazardous for cyclists and certainly are not suitable for the uninitiated or children. The plan recognises the need for improvement, but the older established developments, especially those nearer the town centre at present cannot support active travel arrangements to the aspirational levels envisaged. The plan for future travel from additional surrounding developments, implies the connection and use of established routes, however, these routes cannot be regarded as safe for regular commuting. If the plan cannot address the limitations, then further additions are only likely to exasperate the situation more. I find it inconceivable that any administration would consider promoting active travel with the knowledge that the present older, infrastructure is incapable of growth without dramatic change. Change, depending upon how it is implemented, may have negative consequences to the economy of Moreton-in-Marsh business.

Resident Survey Results Report

Getting around Moreton-in-Marsh (Summary) states "There were over 220 suggested upgrades or new routes”

Interestingly, **Q41**, “Should parking facilities be improved in Moreton-in-Marsh?”, 70% respondents answered "yes" to "in town". The Town Council's Transport Strategy document, aims to improve the layout, but by significantly reducing parking availability, which is in contradiction to the 338/337 responses received from the survey.

Rep #18: CDC Councillor

Submission to the NDP team

The town is a classic Cotswold market town with origins in the middle ages, a wide centre roadway and trees suitable for horse and buggy and with an imposing Corn Exchange. Development was slow. *Properties were varied* but mostly terraced and conforming to the Cotswold vernacular. Pictures show varied roof lines, textures, colours. They meet the test of being interesting from a distance and close-up. *It has 96 listed buildings*.





Town centre diversity and interest

In 2003, almost all of the land east of the railway station consisted of fields. The exception was ribbon development along the A44, Evenlode Road, Todenham Road and at the Fire Service College. The quality of this build varied, but the *developments that were most representative continued this market town vernacular*.



Evenlode Road

The first development (in 2003-4) continued this, as in the picture below, albeit with better parking arrangements. Note the terrace, trees, and grass, good build quality, and Cotswold feel.



Blenheim Way

Until the recent Area Plan was approved, the town then developed without a Plan, piecemeal, without proper infrastructure. My ward as of 2023 election had grown 6x faster than the District average since 2011. A different spatial organisation, density and appearance was generally followed. Traffic grew and both developments and

utility upgrades led to months of excessive town centre traffic blocks, harming retail businesses. The town centre became a car park and throughway for traffic, much of it heavy goods vehicles. The A429 Fosseway railway bridge is listed, dangerous (especially for pedestrians visiting from that side of town), and physically vulnerable.

There have undoubtedly been a number of positive contributions to the town that are enjoyed by owners, *including four public open spaces featuring meadows, attenuation ponds, swales, woodland and streams*. Apart from one adopted by the town council, they all have legacy compliance issues. However, *they can and could offer attractive features*. Many people have moved to the town and live in properties that they are happy to live in. But the balance of the town is disturbed. The "Transport Hub" and railway are considered a reason for development, but this implies that people will work elsewhere. *A market town is not a commuter suburb*: it *needs a proper centre* and a thriving local economy. "Transport Hub" is a misnomer and likely to remain so, since the cost is high, additional parking low, and a prime site in the centre of town would be lost when better alternatives for parking exist.

The town partly owes its existence to being at the meeting of two main routes, the A44 and the A429, now forming a bottle neck with traffic mostly just passing through and taking value from the town.

Rep #18: GCC part 1

To: Sent via e-mail.

Amartya Deb
Economy, Environment, and Infrastructure
[redacted]

Our Ref: 2025/04/CDC-MIM-SEAHRA/CRC

Your Ref:

Date: 07 May 2025

Dear Mr Walker,

Moreton-in-Marsh Neighbourhood Development Plan: SEA and HRA Screening Opinions

Thank you for consulting Gloucestershire County Council (GCC) on this matter.

GCC officers have reviewed the consultation materials for Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) with respect to the January 2025 screening draft of Moreton-in-Marsh Neighbourhood Plan 2018-2031. Officers highlight further potential to address archaeology, urban biodiversity, transport, and public health. High-level recommendations are:

- Recognising archaeological assets and the role of historic environment in achieving net-zero, flood risk mitigation, and conserving urban biodiversity.
- Improving public mass transit, active travel, and green-blue infrastructure for better air quality, and its various benefit on health and wellbeing.
- Tapping potential of Sustainable Drainage Systems (SuDS) for biodiversity.
- Inclusion of vulnerable groups in design of the built environment.

Importantly, officers note that details within “Policy 14: Infrastructure Investment Priorities” are missing in this version of the draft plan. Officers recommend more clarity and further considerations in matters of transport infrastructure aspirations.

Detailed officer-level comments are as below.

Yours sincerely,

Amartya Deb
Senior Planning Officer
Gloucestershire County Council

DETAILED OFFICER COMMENTS

Archaeology

GCC officers welcome the inclusion of Objective "j." under the Environment theme: "Protect and maintain archaeological and built heritage assets deemed to be of value to the community" (p. 17) and associated planning Policy 17: Buildings of Character.

However, it would be beneficial to relate the above objective and policy directly back to a hook in the vision, especially given that the attraction of Moreton-in-Marsh as a place to live and visit draws so heavily on its appearance, traditions and sense of place which in turn derive from its built, archaeological and natural heritage.

Furthermore, Policy 17 only addresses Moreton's built heritage and fails to recognise visible and below ground archaeological sites, despite the introductory section to the Plan which focuses on the town's history. The following document produced by Historic England can provide important pointers in terms of the role played by heritage in neighbourhood plans, including archaeology: Neighbourhood Planning and the Historic Environment (www.historicengland.org.uk)

The **Gloucestershire County Council Historic Environment Record (HER)** can also be contacted for data on known archaeological sites within the parish:

- SEE LINK: Request archaeological data from Gloucestershire's Historic Environment Record (HER) (www.gloucestershire.gov.uk)

It would be useful to recognise the contribution of heritage assets and the numerous cross-cutting benefits they can offer in delivering upon the ambitions underpinning other policies. The protection and enhancement of the historic environment has a strategic role to play in delivering long-term sustainability, climate resilience, the restoration of nature, and economic infrastructure.

For example, in regard to Policy 1: Climate Adaption and Energy Efficiency in Developments, Historic England's Advice Note 18 on *Adapting Historic Buildings for Energy and Carbon Efficiency* could be referenced. For Policy 2: Managing Flood Risk, the conservation and restoration of historic water bodies and floodplain meadows can reduce flood risk. The use of Design Codes is a tangible way of supporting Policy 3: Housing Mix and is a positive element of the Plan, describing the character of the built environment and setting out good design principles for future development. Policy 7: Brownfield First should recognise that brownfield sites can provide benefits to the historic environment, for example in encouraging greater use of derelict sites in the conservation area or just outside, but it should also recognise that brownfields sites often have their own built and archaeological heritage and should be designed in a way that incorporates historic environment considerations at the appropriate stages.

Policy 15: Local Green Spaces would benefit from more explicitly addressing the contribution of local heritage assets to, and their need for protection as part of green spaces. For Policies 15: Local Green Spaces & Policy 18: Enhancing Biodiversity, it would be worthwhile highlighting the numerous cross-cutting benefits that heritage

assets can offer to the management of designated areas, and in delivering sustainable development, land use and enhanced biodiversity. As set out in Natural England's guidance on *Nature recovery and the historic environment*:

> *"Conserving and enhancing the historic environment is an integral part of protecting, managing, and planning for nature and landscapes".*

For example, historic routes, designed landscapes and other heritage assets are often wildlife rich sites which, appropriately managed, can act as important links in a national biodiversity network. Their characteristics will often dictate what species can and cannot thrive. The historic environment can help with understanding whether certain habitats and species will prosper and inform decisions about restoration options and appropriate management. Policy 19: Protected Views could utilise heritage assets to reinforce the importance of Protected Views.

Ultimately, a spatially aware and sustainable Plan should recognise that the protection and enhancement of heritage can coexist alongside multiple other uses and be mutually beneficial.

Ecology

GCC officers have no further comments to make.

Flood Risk Management

Of interest to the Flood Risk Management team are the following points from Policy 2: Managing Flood Risk (p. 26):

a) *When proposals for development are being considered, all sources of flood risks must be considered at the appropriate stages and the sequential and exception tests used to divert development to areas with lower probability of flooding, in accordance with NPPF guidance.*

b) *Proposals for development on land identified by the Environment Agency as lying within either Flood Zone 2 or 3, or in Flood Zone 1 in the circumstances outlined in footnote 63 of paragraph 181 of the December 2024 NPPF, will require a Flood Risk Assessment (FRA), using appropriate calculations based on the highest expected groundwater levels for the area (200 year maximum). Proposals will only be supported where it can be demonstrated in the FRA that:*

    1. *they include appropriate site-specific measures to address effectively all the identified surface and ground water issues; and*

    2. *any residual flood risk can be safely managed.*

c) *Where it is appropriate to do so new developments should incorporate Sustainable Drainage Systems (SuDS).*

GCC officers note there is nothing particularly contentious in the above quoted paragraphs; nothing beyond what the Lead Local Flood Authority (LLFA) already considers.

Policy 18: Enhancing Biodiversity (p. 51): GCC officers note that it does not mention here how enhancing biodiversity can also be integrated into well designed SuDS, which is disappointing.

Minerals and Waste Planning

GCC officers have no further comments to make.

Public Health and Communities

GCC officers welcome the opportunity to comment on this Neighbourhood Development Plan (the plan) and on matters specific to the health and wellbeing of residents that live, work and take their enjoyment in Moreton-in-Marsh and the surrounding neighbourhood area.

Reflecting on the midway point of the plan period (2018-31), it is worth noting that all plan-makers have experienced significant changes during this time that have had a profound impact on shaping our local communities in Gloucestershire. In acknowledging this, the wider determinants of health, such as economic development, employment, and our built and natural environment are brought ever-more into focus, and place-making affords an opportunity for a "right first time" approach to embed primary interventions to improve health and well-being into planning and neighbourhood development.

In response to this, we would welcome a more specific reference to "health and wellbeing" within the plan's vision and objectives. Whilst objectives around the challenges of environment, housing, transport and the economy imply that these themes have an impact in supporting good health, an explicit focus on this throughout the plan would raise the profile and highlight the importance of healthy place-making. As example, this is apparent in the Cotswold Local Plan's policies: *H4 Specialist Accommodation for Older People, INF7 Green Infrastructure, and INF3 Sustainable Transport within the Cotswold Local Plan.*

The transport systems and the wider built environment in Moreton-in-Marsh play a crucial role by either promoting or hindering physical activity. The draft document mentions:

> *"Moreton-in-Marsh as to be generally considered well served by transport, but that it can be difficult or impossible to travel to local villages and even some of the nearby towns using public transport."* (p.7)

In acknowledging this, it is good to see the community commitment to the extensive footpath network across the countryside around Moreton, some of which the draft Neighbourhood Plan states, provide valuable access to nearby attractions including Batsford Arboretum, the Cotswold Falconry, Bourton House Garden and Sezinecote

Gardens into and around the local countryside as well as a number of cycle paths which encourages both walking and cycling.

The propensity to walk and cycle has the potential to contribute to an improving picture of air quality across the plan area. Air pollution has negative effects on health throughout the life course, from pre-birth to old age. The plan should look to set out purposeful policies based around sustainability that should contribute to improving the air we breathe. This could include exploring infrastructure for electric cars within the plan area, which we welcome the consideration of in Policy 1 (e).

Our children are especially vulnerable to dirty air. There is a strong link between air pollution and the worsening of asthma symptoms, and it also plays a part in causing asthma in some. Among children with asthma, those exposed to higher levels of air pollution suffer more frequent chronic respiratory symptoms. Designing-in the "habit for movement", drives further co-benefits to health including, reduced non-communicable diseases burden (cardiovascular and respiratory disease), injuries, and better mental health.

GCC officers welcome the plan's intent to ensure community access and enjoyment continues across local green spaces in the plan area (Policy 15). Again, with such valuable assets, specific reference to both the physical and mental health benefits of these facilities and community infrastructure should be detailed. Giving consideration to high quality green and blue infrastructure across all stages of plan-making and development will support the improvement of health and wellbeing and build a sense of community and place. We encourage plan makers, if they are unfamiliar, to consider the incorporation of the Building with Nature Framework:

- Planners — Building with Nature (www.buildingwithnature.org.uk)

Noting the Plan's objectives concerning housing supply, it would be strengthened further by acknowledging the changing needs of housing over a life course and ensuring that mix and tenure of housing provision will provide high standards of affordable, accessible dwellings, and that accessibility to the local facilities is a primary consideration. The importance of accessible housing design cannot be overstated - impacting individuals with disabilities and health challenges, but also the wider systems in society including adult social care and the NHS. Improving and maintaining the health of older adults is a strong social responsibility and the Chief Medical Officer's annual report 2023; Health in an aging society Chief Medical Officer's annual report 2023: health in an ageing society - GOV.UK (www.gov.uk) underlines the geography of older age in the UK. The report makes it clear that the increase in an aging population will be in our rural and semi-rural areas. Cotswold district has seen the 2nd highest population growth out of Gloucestershire's six districts and has the highest % of 65+ year olds. See: 2021 Census (www.gloucestershire.gov.uk). Thus, catering to older population should be an area of focus for plan makers in the Cotswold.

Local plans should include specific and measurable targets for accessible and adaptable new build housing. This should include a minimum 8% for wheelchair housing or M4 3 and we would advocate that all of the rest of the new build housing should be to the lower but very important M4 2 standard. With regards to specific policies within the draft plan:

Policy 3: Housing Mix

GCC officers welcome the commitment around purpose built older people accommodation and housing designed to meet the aspirations of older people in Moreton-in-Marsh wishing to downsize. Part B of this policy states that 'at least 25% of dwellings, should meet Lifetimes Home Standards or its equivalent.' We would welcome a stronger commitment within the plan to develop more accessible and adaptable homes. Given both the demographics of Moreton-in-Marsh, as highlighted in the introduction section, and the update from the government in October 2024 to ensuring that all new buildings are accessible and adaptable where possible to increase the stock of more inclusive home, a commitment to 95% of all new homes to meet M4(2) standards and 5% (based on need) to meet M4(3) standards within the Neighbourhood Plan would reflect the needs of residents in Morton-in-March and national government direction: Performance of Housing Authorities in DFG Delivery (www.foundations.uk.com)

Policy 4: Affordable Housing

GCC officers welcome the inclusion of a policy on affordable housing. However, given that the diverse results for Morton-in-Marsh within the Index of Multiple Deprivation (IMD), highlighted on page 11, we would welcome a stronger commitment to providing social housing tenure as an affordable housing option, as it is not explicitly referenced within the policy. Providing social housing would support Morton-in-Marsh to reduce deprivation in several key areas: employment, education and barriers to housing. It would support with retaining people in the local area and enabling then to have an opportunity to access both work and education opportunities.

Policy 5: Well Designed Housing and Places

GCC officers welcome the inclusion of Policy 5 and have no comments to add.

Staying with housing, we note that the plan does not identify any challenges re. social isolation and loneliness that can affect older people in particular; and is harmful to heath. The Cotswold Local Plan captures the challenges in this area:

> "*Research shows the effects of loneliness/isolation increases the risk of high blood pressure, being more prone to depression, and leads to a 64% increased chance of developing clinical dementia. Social isolation causes 43% of social referrals in South Cotswolds"* [SD4 (5a.4.20)].

Plan makers may wish, if not already, to familiarise themselves with the 2022 Director of Public Health annual Report for Gloucestershire; *No person is an island; Social connections in Gloucestershire* Annual Public Health Report 2022-23.pdf (gloucestershire.gov.uk). The report highlights both the power of social connections but also the challenges, many of which are experienced by those living in rural areas across Gloucestershire. Crucially, it sharpens a focus on the work being done to tackle social isolation and the responsibility we all share in supporting those most in need. Using national studies, it was calculated that around 6,000 older people in Gloucestershire feel lonely always or often. This also underlines the importance of considering how communities create opportunities for social connections across the life course. A local survey reveals that 5% of social care service users aged 65+ had little social contact with people and felt isolated, and a further 15% had some social contact but not enough Summary (gloucestershire.gov.uk).

Transport Planning

GCC officers welcome the Moreton-in-Marsh Neighbourhood Plan consultation. The draft plan usefully sets out the transport context, highlighting the town's mainline railway station, local bus connections, and walking and cycling network. We welcome the inclusion of high quality, safe transport links in the vision for Moreton-in-Marsh.

GCC officers acknowledge the focus of Policy 14: Infrastructure Investment Priorities on trying to resolve the present parking issue in the town centre by providing alternative car parking at the Transport Hub. ***However, officers also note that the justification for Policy 14 and relevant details are missing from the shared draft Neighbourhood Plan under consultation.***

GCC officers recommend that the remit of Policy 14 is expanded to also consider active travel links to/from the station, EV and car club parking spaces, as well as bus stop/real time passenger information provision. The draft Neighbourhood Plan may also consider other infrastructure such as lighting, CCTV and seating/other community facilities to enhance the public realm environment and enhance feelings of safety. Officers believe this is important to provide genuine modal choice and to encourage sustainable means of access to Moreton-in-Marsh Railway Station. Officers have assumed that the Railway Station is what the Transport Hub is referring to and recommend that this to be explicitly set out in the policy wording.

Officers recommend, the Neighbourhood Plan should provide greater clarity in terms of the community aspiration for transport hubs. In GCC's Interchange Hub strategy and Bus Service Improvement Plan, officers have highlighted two sites in particular that would qualify as transport hubs:

- Moreton-in-Marsh High Street
- Moreton-in-Marsh Railway station

An explicit reference to the above-mentioned sites would be helpful, as both sites have significant potential to improve the existing public realm environment and ease the interchange between sustainable modes.

GCC officers agree with transport matters raised by GCC's Public Health colleagues (see above). Officers would welcome measures to promote the Active Travel network in and around Moreton-in-Marsh, including provision of wayfinding to and from transport hubs, the town centre, and onward destinations.

In addition, GCC officers recommend that Policy 21: Transport and Active Travel explicitly refer to destinations for active travel beyond links to national cycle ways, for example to key services such as transport hubs, education, health, employment and retail. Our countywide cycling infrastructure plan also identifies a key link between Stow and Moreton, highlighting a latent demand for active journeys between the two settlements.

Rep #20: GCC part 2

To: Sent via e-mail.

Amartya Deb
Economy, Environment, and Infrastructure
[redacted]

Our Ref: 2026/04/CDC-MIMNDPR16/AD **Your Ref:** **Date:** 29 May 2026

Dear Sir/Madam,

Moreton-in-Marsh Neighbourhood Plan (Regulation 16) Consultation

Thank you for consulting Gloucestershire County Council (GCC) on this matter.

GCC officers have reviewed the materials for Regulation 16 consultation of Moreton-in-Marsh Neighbourhood Plan 2018-2043, through Cotswold District Council. At this stage of consultation, highlights of officer comments include:

- High-quality design of public realm and built environment for the town to become more inclusive – particularly for the elderly and mobility users.
- Various considerations towards nature recovery as well as climate change adaptation and mitigation per March 2026 update of LURA 2023.

GCC officers of Transport Planning has advised that on Parking matters, further discussion will be needed with GCC's Highways Development Management.

Previously submitted GCC officer response to SEA and HRA Screening Opinions of this plan preparation consultation is attached as:

- **Annexure 1** – GCC202501CDCMIMSEAHRAAD

Detailed officer-level comments are as below.

Yours faithfully,

Amartya Deb
Senior Planning Officer
Gloucestershire County Council

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INTRODUCTION

Moreton-in-Marsh is a small, but growing market town in Cotswold District. Partly surrounded by the picturesque Cotswolds National Landscape, and with a conservation area designated along its High Street, the town has a rich legacy of cultural and natural heritage. Currently, the town also has a relatively higher share of old age population (higher than county average).

Bearing these in mind, this GCC officer response highlights need for the Regulation 16 draft of Moreton-in-Marsh Neighbourhood Plan 2018-2043 to address matters of **climate and nature**. In addition to having regard to Gloucestershire Local Nature Recovery Strategy, GCC officers advise on reducing car dependency and enabling active travel in the public realm. This includes improving pedestrian infrastructure along the High Street.

This officer-level response should be read with GCC officer response to SEA and HRA Screening Opinions of plan preparation in May 2025. It advises on recognising archaeological assets and the role of historic environment in achieving net-zero, flood risk mitigation, and conserving urban biodiversity.

Moreton-in-Marsh is well connected by regional highway and rail networks that pose both opportunities and challenges – emphasising a strong link between **roads and places**. In addition to those matters identified by the draft plan, GCC officers point out how further infrastructural improvements in public realm, can create a high-quality built environment that encourages accessibility and sustainable mobility.

Alongside advice on strengthening policies through wordings and further details, GCC officers suggest several ways Community Infrastructure Levy (CIL) can be utilised for making the town more inclusive and accessible for vulnerable population.

DETAILED OFFICER COMMENTS

Adult Social Care

GCC officers support draft plan's policies for Moreton-in-Marsh town, that will embed new developments with health, accessibility, and affordability principles to support vulnerable groups and sustain the care workforce (as outlined in the Gloucestershire market position statement (MPS) 2024) and the three shifts detailed in the Government's 10-Year Health Plan for England ("Fit for the Future", July 2025) i.e.,

Shift 1 – From hospital to community care.
Shift 2 – From analogue to digital.
Shift 3 – From sickness to prevention.

Policy Three – Housing Mix

GCC officers welcome the objective outlined in the draft neighbourhood plan (regulation 16) to ensure "new homes are of **high-quality design** and built to Building Research Establishment Environmental Assessment Method (BREEAM) standards" (page 19) and the inclusion of design codes (Appendix A). However, given the age profile detailed in the draft neighbourhood plan, officers feel that **Policy Three could be strengthened** by including **specific building targets** relating to M4 (2) Accessible and Adaptable properties and M4(3) Wheelchair user dwellings, part of Approved Document M of the UK Building Regulations.

The Old Age Dependency Ratio (OADR) for the Cotswolds is 450. This means there are 450 people of pensionable age per 1,000 working age people (Data & Analysis Team 2021) – the average for Gloucestershire is 379 and England 365. The high OADR highlights the need for coordinated strategic planning across housing, transport, community support, and **digital inclusion** to ensure that future developments provide **age friendly communities,** that foster a supportive and inclusive environment, allowing individuals to lead healthy, meaningful lives as they grow older.

Housing that supports **community engagement, independence, and dignity** contributes to better **mental and physical health outcomes**. To ensure new housing supports community engagement officers would recommend including specific targets for M4 (2) and M4 (3) that align with the most recent evidence. For example, the Gloucestershire Local Housing Needs Assessment 2019 proposes a target of 67% for M4(2) new builds and 67% of new housing to meet M4(2) standards and 8% to meet M4(3) standards.

Policy Four – Affordability

GCC officers welcome the inclusion of Affordable Housing being tenure blind – built using the same materials and material and in the same style as any market housing on the site to the same standards. Moreton East and Moreton West are both in the 4th decile for the deprivation domain barriers to housing and services (indices-of-

deprivation-2025-data-table.xlsx). This measures the physical and financial accessibility of housing and local services. A decile score of 4 means that Moreton-in-Marsh is in the 40% most deprived areas nationally for barriers to housing and services. Therefore, GCC officers **would welcome reference to specific affordable housing numbers** or % required on new developments, including socially rented and affordable homes, **enabling residents of all ages** and backgrounds to live securely and sustainably and reduce the barriers to housing and local services currently experienced by residents of Moreton-in-Marsh.

The Gloucestershire MPS details a static working-age population in the Cotswold and rising demand for adult social care. Aligning housing growth with affordability and accessibility supports workforce stability and reduces recruitment pressures.

Policy Fourteen – Infrastructure Investment Projects

Officers welcome the inclusion of improving Accessibility around Moreton-in Marsh in Policy Fourteen. The Centre for Ageing better have developed some age friendly guides, includes guides on **age friendly bus stops, parks and green space, seating and rest, and age-friendly streets** (see: Age-friendly Built Environment Quick Guides | Centre for Ageing Better, that could be adopted by Moreton-in-Marsh to improve accessibility across the town **through use of CIL** to meet this objective.

Additional resources to include in the relevant appendices:

1. **Age-Friendly Communities Framework.**
   Endorsed by the Local Government Association, this framework helps local authorities create inclusive environments through better transport, public spaces, and housing access. See: Age-friendly Communities: a handbook of principles to guide local policy and action

2. **Co-Production and Community-Led Housing.**
   The Older People's Taskforce encourages co-production with older adults to design housing that reflects diverse cultural, faith, and lifestyle needs, fostering community engagement and reducing isolation. See: Our Future Homes: Housing that promotes wellbeing and community for an ageing population - GOV.UK

3. **Equality Act 2010 & Public Sector Equality Duty.**
   Requires authorities to eliminate discrimination and involve disabled people in policy and service design. See: Equality Act 2010

Archaeology

Our previous comments made in GCC officer response (dated May 2025) to the SEA and HRA Screening Opinions regarding Policy 16 on "Conserving non-designated heritage assets" (previously 17 "Buildings of Character") and other policies remain current.

For convenience, GCC officer-level response to Moreton-in-Marsh's Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Opinions is attached as ***Annexure 1****.*

Ecology

Policy Seventeen – Enhancing Biodiversity

GCC officers welcome the draft neighbourhood plan's Policy Seventeen on "Enhancing Biodiversity". Please note, this **policy now needs to be reviewed** due to various updates to planning policy and guidance relating to nature recovery.

In February 2026, **GCC adopted the Gloucestershire Local Nature Recovery Strategy (LNRS).** Further information on can be found here: Gloucestershire Local Nature Recovery Strategy |Gloucestershire County Council.

In March 2026, Sections 98 and 99 of the Levelling-up and Regeneration Act 2023 came into force. This now means that there are additional legal compliance requirements for development plans & neighbourhood plans.

Section 98 of the LURA states the following:

> *(b) take account of any local nature recovery strategy, under section 104 of the Environment Act 2021, that relates to all or part of the plan area, including in particular —*
>
> *(i) the areas identified in the strategy as areas which –*
> *(A) are, or could become, of particular importance for biodiversity, or*
> *(B) are areas where the recovery or enhancement of biodiversity could make a particular contribution to other environmental benefits,*
> *(ii) the priorities set out in the strategy for recovering or enhancing biodiversity, and*
> *(iii) the proposals set out in the strategy as to potential measures relating to those priorities.*

The current **Planning Practice Guidance (PPG) on Natural Environment, Paragraph: 046** Reference ID: 8-046-20250219 Revision date: 19 02 2025 provides **further detail** on "**How should local planning authorities have regard to Local Nature Recovery Strategies in plan making?"** This could help support the draft plan's decisions.

Minerals and Waste Planning

GCC officers have no further comments to make.

Transport Planning

Vision and Objectives

GCC officers broadly supportive of the vision and objectives for the draft NDP in the longer term 2043 ambition for sustainable growth that benefits from access to local services, excellent transport links, a network of safe walking and cycling routes, limiting the need for vehicular travel within the town and offering choice of transport options to reduce congestion and emissions, to improve air quality and public health.

Proposed growth and development proposals in the town have identified several infrastructure issues to be addressed. This includes local services, traffic management, public realm, safer and more pleasant access for residents and visitors, for which GCC officers are broadly supportive where sustainable development meets the needs of the community and requirements of National Planning Policy Framework (NPPF).

Community aspirations: New Steering Group

GCC officers are broadly supportive of a new Community Plan Steering Group to support and follow through on the community aspirations identified in the preparation of the Moreton-in-Marsh Neighbourhood Plan.

Heavy Goods Traffic and Congestion

GCC officers note that the draft neighbourhood plan (Reg.16) aims to address the challenges of **increasing traffic on the A429 Fosse Way**, and the impacts this has on the High Street on local community. In addressing the community's main concern for congestion and heavy goods vehicle (HGV) traffic, GCC officers welcome the transport objectives to improve public realm and traffic management in the town centre. Officers understand, this will ensure Moreton-in-Marsh remains a thriving key service centre in the north of Cotswold District, whilst recognising alternatives to private car use by encouraging modes such as active travel and public transport.

This increase in traffic congestion, recognised in the draft plan, is also leading to air pollution, increased noise pollution, and road safety risks for pedestrians, cyclists and mobility users accessing the town and crossing the High Street. Therefore, GCC officers support road safety and the **safe movement of people and freight** (where appropriate) in and around the town.

Policy Twenty – Transport & Active Travel

To meet the aims of the draft neighbourhood plan, transport policies should consider additional specific infrastructure improvements in Moreton-in-Marsh town centre. GCC officers feel, there is **a strong need for improvements** in pedestrian infrastructures, pedestrian space, and pedestrian safety **along the High Street.**

Officers recommend **increasing pedestrian crossings** to improve permeability of the high street.

To address "**Community Aspiration 3 on Public Transport**", Policy Twenty should also consider seeking developer contributions to improving the railway station and promote it as a key "**transport hub"** for Moreton-in-Marsh town and the northern areas of Cotswold. Improvements include enhanced bus stop, cycle parking and active travel facilities to encourage travel to/from the station by sustainable modes.

GCC officers would welcome **further details** on the parish's vision for an "**interchange hub"** within Moreton-in-Marsh. As stated in Policy Twenty, GCC officers welcome prioritisation of active travel to/from new development in accordance with national guidance. Although, a **distinction between different active travel modes (walking, wheeling and cycling) as well as public transport** should be made **in the policy wording**.

Parking standards and facilities

GCC officers of Transport Planning **cannot comment specifically on** parking in residential standards and provision of parking facilities in the town where active travel opportunities are explored – these will **require further discussion** and agreement with **GCC's Highways Development Management**.

Rep #21: Resident

Mark Harrison

From: [redacted]
Sent: 29 May 2026 18:04
To: Neighbourhood Planning
Subject: Moreton in Marsh - Gebe Land car park - Consultation feedback

[redacted]

Dear CDC

The latest NDP consultation output proposes a green field designation on the Glebe Land to effectively prevent its use as a car park at any point in the future. I strongly disagree with such a designation.

As a result, my view is that a green field designation should NOT be placed on the Glebe Land as that field is a very good location for a new out of town car park which the town desperately needs.

Yours faithfully

[redacted]

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COTSWOLD
District Council

Cirencester Neighbourhood Plan
c/o Andrew Tubb
Cirencester Town Council

info@cirencester.gov.uk
By e-mail only

Enquiries to: Mark Harrison
Senior Planning Policy Officer
mark.harrison@cotswold.gov.uk

14th May 2026

Dear Mr Tubb,

Cirencester Neighbourhood Plan
Response to Reg 16 draft Neighbourhood Plan consultation

Firstly, I would like to congratulate the Town Council and their Steering Group on reaching this stage in plan preparation and for creating a well-considered draft plan for the future of the parish.

I have consulted colleagues throughout the District Council on the draft plan and have received a number of comments from various service areas. The District Council's comments are presented in the schedule that follows this letter with internal consultees comments embedded with our own.

Comments have been made about both the supporting text, which sets the context and justification for the policies, and on the policies proposed for inclusion in the Plan.

I hope that you will see these comments as critical support. They are intended to inform modification to the Plan so that it best meets the expectation of the Town Council in terms of the future determination of development proposals, and, crucially, that the Plan can proceed to independent examination once it has been submitted, with a greater expectation of a positive outcome.

I hope the comments made by the District Council are helpful in reaching a conclusion to plan preparation. We will, of course, continue to support the Town Council and Steering Group with advice as necessary and with practical support.

Finally, I would advise that the comments made by the District Council in response to this consultation on the pre-submission draft plan do not constitute a *formal* opinion about whether the Plan as currently drafted meets the basic conditions.

The District Council is not required to issue a decision statement in respect of that matter until the independent examination has been completed (which follows this consultation).

Yours sincerely,

Mark Harrison

Mark Harrison BSc(Hons) MA MRTPI
Senior Planning Policy & Neighbourhood Plans Officer
Planning Policy and Infrastructure
Cotswold District Council

P: Cotswold District Council, Trinity Road, Cirencester, GL7 1PX
T: CDC colleagues chat to me on Teams
E: mark.harrison@cotswold.gov.uk
W: Planning Policy webpages

COTSWOLD
District Council

Regulation 16 Consultation

Regulation 16 of the Neighbourhood Planning Regulations require the draft plan proposal to be the subject of consultation after submission (Reg 15) to the local authority for independent examination. The consultation should last at least 6 weeks.

A consultation for the plan is being undertaken from Thursday 16th April to Friday 29th May. Comments for the District Council are provided as relevant on the day of 14th May 2025.

Consultation requirements include publicising the draft plan to people who live, work or run business in the area. The publicity must include details of the proposed neighbourhood plan, where and when it may be viewed, and how to make comments on the plan and by what date.

Certain statutory bodies must be consulted, including the district council (as the local planning authority), the Environment agency, Natural England and Historic England. It is also advisable to consult and local business or community organisations, such as chambers of commerce, civic societies and local trusts.

Representations and Modifications

Representations made during the consultation will be collated and redacted by CDC, and sent to an Independent Examiner (once procured). They will then appraise the comments, the Plan, and supporting evidence to make recommendations, and if necessary modifications, on whether the plan meets the Basic Conditions in order for the plan to be adopted by CDC.

Considerations

The Basic Conditions an Examiner will consider for a Neighbourhood Plan are as follows:

- National policy compliance
- Contribution to achievement of sustainable development
- General conformity with “strategic policy”
- Compatible with EU obligations (e.g. SEA)
- Does not breach habitats regulations

MHCLG guidance (June 2025) on plan-making also requires:

- Clarity and certainty;
- Detailed policies map(s);
- Sufficient evidence and justification.

Comments provided by CDC will be based upon these considerations, although as above a *formal* opinion on the basic conditions cannot be made until after independent examination.

Conformity with Strategic Policy

Please note that an emerging Neighbourhood Plan can only be considered against policies in the adopted (i.e. current) Cotswold District Council Local Plan 2011-2031 (adopted in August 2018). Although a Local Plan review is underway, this currently carries no weight.

However, of note is that as part of the Local Plan review, consultations and a feasibility study have been undertaken regarding housing development in Cirencester. This can help understand why no housing sites are proposed for allocation in the Neighbourhood Plan despite a district-wide and local need. There is no requirement for Neighbourhood Plans to allocate housing sites.

Comment Schedule

<table>
<tr><th><u>Policy No.</u></th><th><u>Policy Name</u></th><th><u>CDC Comments</u></th></tr>
<tr><td>AM1</td><td>The Cirencester Spoke & Wheel Cycle and Footpath Network</td><td rowspan="6">Generally supportive of what is set out about 20 min neighbourhoods, the town centre policy, VLR alternative route to Kemble etc.

One slight tweak I’d make: Policy AM3 - The Pedestrian Experience
Point C) curating > spaces that facilitate events and festivals

Allan Keller, Sustainable Transport Lead has made these comments.</td></tr>
<tr><td>AM2</td><td>Town & Country Connections</td></tr>
<tr><td>AM3</td><td>The Pedestrian Experience</td></tr>
<tr><td>AM4</td><td>Integrated Mobility Hub</td></tr>
<tr><td>AM5</td><td>Strategic Connections & Transport Links</td></tr>
<tr><td>AM6</td><td>Sustainable and Active Travel</td></tr>
<tr><td>DBE1</td><td>Design Quality

Harrison Bowley, Head of DM has made these comments.</td><td>Generally no objection, criterion h is very prescriptive, are the TC confident that this is entirely reasonable and there are no scenarios where this could preclude otherwise acceptable proposals?</td></tr>
<tr><td>DBE2</td><td>Protection of Landscape & Townscape Views</td><td>Policy DBE2 (g) almost seems to be encouraging potential development at Powells School … but this would clearly need to bear in mind the conservation area & potential setting of LBs.</td></tr>
</table>

	Justin Ayton, Senior Conservation Officer has made these comments.	
DBE3	Redevelopment and Conversion of Existing Properties **Justin Ayton, Senior Conservation Officer** and **Harrison Bowley, Head of DM,** have made these comments.	Policy DBE3 (c) the subdivision of large houses should perhaps have a caveat regarding listed buildings/designated heritage assets, where subdivision may be inherently harmful & not their optimum viable use. While the objective of supporting vitality and reuse of buildings in the town centre is recognised, the policy seeks to control matters that are not always capable of being regulated through the planning system. In particular, the merging of units may not always constitute development requiring planning permission, and criterion a cannot ensure occupation by "small, local and/or independent traders", as planning controls land use rather than the identity of end users. Criterion c appears arbitrary and would require justification through the evidence base. The policy should be simplified and refocused on matters that planning can properly control, such as external design, frontage subdivision/amalgamation where permission is required, and the principle of upper-floor residential reuse
DBE4	Protection of Non-Designated Heritage Assets **Justin Ayton, Senior Conservation Officer** has made this comment.	The list should not be presented as in any way definitive, even if up for potential additions at a later date. The LPA must have the freedom to decide on a case-by-case basis whether a building is an NDHA even if not identified in the Neighbourhood Plan.
DBE5	Net-Zero and Energy Efficiency Measures in the Design & Construction Process	Perhaps just changing "and" to "or" between emissions and embodied would do the trick? The policy also says "should", so if there were pertinent reasons not to, e.g. the proposal was very minor.
DBE6	Energy Use in New Buildings **Harrison Bowley, Head of DM,** have	I always have concerns with these sorts of policies as they largely duplicate other regimes such as building regs and are incredibly challenging for planning officers to assess given the specialist knowledge required. Criterion f is very onerous. This should be covered as a pre-commencement requirement only.

	made these comments.	
DBE7	Homes in Multiple Occupation **Harrison Bowley, Head of DM,** have made these comments.	No objection in principle insofar as it seeks to manage the amenity and character impacts of HMOs. However, as drafted it is overly rigid and would benefit from modification. Criteria (a) and (c) are reasonable planning considerations. By contrast, criteria (d) and (e) introduce absolute thresholds and separation distances that appear arbitrary unless clearly justified by a robust and up-to-date evidence base. Criterion (b) is unclearly worded and should be simplified. The policy should also recognise that it will only operate where planning permission is required for an HMO proposal.
QPR1	Illuminated Signage	No comment.
QPR2	Quality Streets & Spaces	No comment.
QPR3	Social and Civic Spaces	No comment.
QPR4	Heritage Trails and Wayfinding Systems	No objection in principle, however it is unclear if this relates to development that would require planning permission.
TMN1	20 Minute Neighbourhoods	Support this concept.
NE1	Natural and Semi-Natural Habitat Schemes	No comment.
NE2 Lesley	Wildlife Corridors	Criterion (a) …planting and links. The policy would benefit from an example of what is meant by links. Criterion (b) needs clarity. What is expected, an example would be helpful. I see examples are given in paragraphs 10.18 and 10.9, but an example could be given in the policy for speed of reference. Suggested wording …examples include but not limited to the wilding of edges play areas or verges.
NE3	Green Infrastructure Protection & Enhancement	It might be worth making reference to Natural England's GI Framework. Building with Nature is a good tool, but the publication of NE's standard in 2023 is more applicable.

NE4	Local Green Space Designations **Lesley Davies, Planning Policy Officer** and **Harrison Bowley, Head of DM,** have made these comments.	Not sure how this policy could work? This is something that should be covered by the emerging Local Plan. No objection in principle, are we satisfied this complies with the green space/green belt policies in the NPPF? It refers to special circumstances, is this sufficient?
NE5	Green Gaps **Harrison Bowley, Head of DM,** have made these comments.	This policy seems incredibly challenging to implement and potentially quite unreasonable. How could a development compensate for loss, does the compensation need to be the same amount of space? Same quality? Same location? – could this lead to Grampian style conditions for off-site landscaping works? The policy applies to any proposal resulting in the "loss of undeveloped land" between Cirencester and neighbouring parishes, but does not explain whether the loss must be harmful to settlement separation, landscape character, openness, identity or coalescence. If the purpose of the policy is to prevent coalescence or protect the undeveloped gap between settlements, then providing "replacement landscaped areas" elsewhere may not address the actual harm. Once the physical gap is lost, landscaping somewhere else does not necessarily preserve the function of the gap. Additionally, the policy does not say replacement landscaped areas must be equivalent in scale, location, function, quality, accessibility, permanence or ecological/landscape value.
LE1	Protect and Enhance Economic Activity	No comment.
LE2	Provision for Innovative Work Spaces, New and Small Businesses	No comment.
LE3	Skills Development	No comment.
LE4	New Employment Premises and Design Quality	No comment.

WBC1	Air Quality **Harrison Bowley, Head of DM,** have made these comments.	Criterion a is too definitive. A policy should usually assess whether the proposal would cause unacceptable air quality impacts, rather than prohibit an entire type of development. National guidance expects air quality impacts to be considered based on the development and its location. Requiring all developers to monitor air quality, including particulates, could be excessive for minor development. National guidance says air quality assessments should be proportionate to the nature and scale of development and the likely impacts.
WBC2	Equal Access to Public Open Spaces for All	No comment.
WBC3	Access to Play Spaces **Harrison Bowley, Head of DM,** have made these comments.	Supportive of the objective. The policy does not specify whether provision should be on-site or off-site, how need is calculated, what "nearby" means, or what accessibility standard applies. National policy expects open space/play provision to be based on robust, up-to-date assessments of need, including quantity and quality deficits/surpluses. Requiring new play spaces to be maintained by the Town Council or a community management trust may be unreasonable if those bodies are unwilling or unable to take them on. It would be better to require a suitable long-term management and maintenance arrangement, without naming only two options. Any off-site contribution or maintenance payment must be necessary, directly related to the development, and fairly and reasonably related in scale and kind, this policy skips the demand/planning harm point and assumes a need arising from all development, which is could be problematic.
WBC4	Community Facilities **Harrison Bowley, Head of DM,** have made these comments.	Criterion a is not consistent with LP Policy INF2. Viability alone is too rigid and may leave community spaces more vulnerable. INF2 requires a demonstration of no need for a facility, this can protect facilities and sets a slightly higher bar for loss of facilities.
WBC5	Designing Out Crime **Harrison Bowley, Head of DM,** have made these comments.	No objection, although 'Development Plans' should be clearer – does this include householder development? Some householder developments don't require a D&A, does the NDP propose introducing a local requirement?
WBC6	Light Pollution	No comment.

WBC7	Noise Pollution	No comment.

Comments from **Justin Ayton, Senior Conservation Officer:**

7.5.3 The important phases of the town identified jump from medieval to 19th-century industrial, missing out the 18th century entirely! The Georgian phase is very significant to the town & should be identified for completeness & consistency.

7.7 Surely the straight Roman roads that survive are worthy of a mention: the Decamanus (main east-west road) which survives in Querns Lane-Lewis Lane; furthermore, South Way is not a 20th-century creation, but a 20th-century recreation of part of the Cardo, the main Roman north-south road, which continues south along Tower Street.

7.10 The present, mediaeval & post mediaeval core is not the same place as the Roman core! This was very common, as due to the density of the town centres, large plots for churches were usually only available towards the edges of the towns; then, over time, as the town diminished following the withdrawal of the legions in 410, the functional centre of the town gradually migrated towards the main church. The Roman town was centred on the Forum, to the east of the junction between the Decamanus/Lewis Lane & the Cardo/Tower Street, some distance from its successor, the Market Place.

7.35 This paragraph upon NDHAs included the un-caveated, stand-alone sentence *'These types of assets can be removed or altered.'* I would hope that this is some form of typo, as it does not seem to accord with national or local guidance, or even the rest of the Neighbourhood Plan.

7.42 The assessment of NDHAs was not 'using' the HE criteria, but 'based on' (Local Plan, page 155). Again, the concern is that it could cause us problems if the neighbourhood plan is identifying NDHAs in a way that is inconsistent with the LPA, & potentially limiting our ability to consider whether buildings qualify on a case-by-case basis. Would be better to refer to Table 6 of the Local Plan.

7.43 The weighting on HE criteria is too strong. Better to refer to the criteria within the Local Plan, & make reference to the list not being definitive, & that additional NDHAs may be identified, in accordance with Table 6 of the Local Plan, on a case-by-case basis.

Comments from **Lesley Davies, Planning Policy Officer**:

Paragraph 10.2 – wording suggestion.

Cirencester is a town sitting on the fringes of the Cotswold National Landscape (CNL) , previously known as the Cotswold Area of Outstanding Beauty (AONB).

Paragraph 10.11 – Could also make reference to the Climate Change Emergency declared by CDC in 2019, if you feel appropriate. It might be mentioned in another paragraph!
https://www.cotswold.gov.uk/environment/climate-action/cotswold-climate-and-ecological-emergencies/

Paragraph 10.17 Helpful to add the date of the NPPF you are referring to.

Paragraph 10.24 – this feels more like a policy

Paragraph 10.29 – How would you go about extending these linkages?

Paragraph 10.36 – Update reference to latest NPPF the 24 version – not too many changes, mostly paragraph numbering. The consultation for latest draft version of the NPPF published in 2025 has only recently closed March 26.

Paragraph 10.52 – source of information regarding numbers served by Shorncote sewage works would be helpful.

Cirencester Neighbourhood Plan
Submission Version

Part 1
Reg 16

cirencester
town council

Cirencester
Neighbourhood Plan



JANUARY 2026

Acknowledgments
Preparing the Neighbourhood Plan has been a community participative process with residents being appointed to the Steering Group and directly involved with shaping the Reg14 document.

Cirencester Town Council wishes to thank the people of Cirencester whose responses and comments contributed to the Neighbourhood Development Plan policies and the dedicated group of community volunteers on the Neighbourhood Plan Steering Group, past and present, who went above and beyond to ensure the needs of the community are reflected in the Plan.

- Current members: Nicholas Arbuthnott, Tony Buxton and Martin Portus.
- Previous members: Christina Ibbotson, the late Jim Grant, Brian Hudson, the late Patrick Moylan, Marco Taylor, Jon Athawes, Meg Blumsom, Tristan Wilkinson, Carole Boydell, Anne Simpson and James Haestier.

The Town Council would also like to acknowledge the input of Richard Eastham at Feria Urbanism and Forward Planning and Community Partnerships Teams at Cotswold District Council, with particular thanks to James Brain and Joseph Walker, respectively, who have provided invaluable advice and support throughout the process.

In addition to the community representatives, various elected representatives serve on the Steering Group, currently they are: Councillor Nigel Robbins, Councillor Andy Jopp and Councillor Patrick Coleman. Councillor Sabrina Dixon, Chair of the Town Council's Climate and Environment Committee and Andrew Tubb, Chief Executive Officer of the Town Council are also members of the Steering Group in a non-voting advisory capacity.

Cirencester
Neighbourhood Plan

BACKGROUND

The preparation of a Neighbourhood Plan for Cirencester was commissioned by the Town Council, as the qualifying body, to build on previous place shaping work, such as the Community Plan 'Our Future Cirencester', the Public Realm Design Code and planning Concept Statement. This previous work can be viewed at: https://cirencester.gov.uk/planning-and-development

This is an opportunity for the community to influence and shape planning policy for future generations; a Neighbourhood Plan gives the people who know and love Cirencester, a real voice and input to agree a future vision for Cirencester, through planned sustainable growth, which meets community need and protects Cirencester's unique qualities.

A Steering Group, including community representatives, was appointed to lead on the preparation of the Plan with Richard Eastham at Feria Urbanism being appointed by Council as the lead planning consultant.

The original purpose of preparing a Neighbourhood Plan was to add context and detail to planning policies within the Cotswold District Local Plan which have an impact on Cirencester, and to establish planning policies for issues on which the Local Plan was silent.

The full Reg 14 draft document was consulted on in early 2024 and all comments were collated and considered in producing this Reg 16 submission version of the Neighbourhood Plan; the Consultation Statement and Basic Conditions statement are included within the Reg 16 submission.

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VISION STATEMENT

Our vision for Cirencester, in the period to 2041, is to pass on to future generations an historic and vibrant, welcoming, and friendly rural market town with a strong sense of community and wellbeing. It will be rich in heritage, character, leisure, and cultural opportunities.

Cirencester will thrive by capitalising on its heritage and the character of its urban streets while facilitating sympathetic, high quality and sustainable economic and residential growth. This will deliver for all residents and users of the town while respecting the environment, responding to the climate emergency, and supporting employment and skills opportunities.

The town will be well connected to a series of green parks and open spaces, nature, and the surrounding countryside, which will retain key attributes with improvements where appropriate. Recreational opportunities will be accessible to all. Opportunities for safe walking and cycling connections across all areas of the town will be improved as will active travel and public transport connections to its surrounding towns, villages, and countryside.

All areas of the town will have easy and accessible access to key services, including transport, with a more diverse cultural scene and sport and recreation facilities that meet the needs of a growing population.

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01 The Cirencester Context

02 The Cirencester of Tomorrow

03 Preparing the Plan

04 Aims & Objectives

05 Cirencester Town Centre

06 Access & Movement

07 Design & Built Environment

08 Quality Public Realm

09 The 20 Minute Neighbourhood

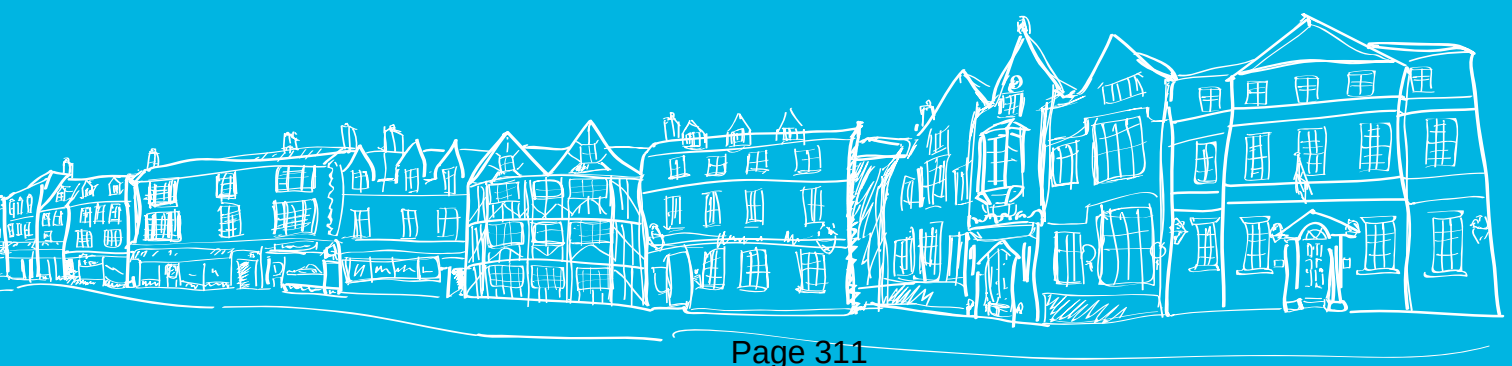
10 The Natural Environment

11 The Local Economy

12 Wellbeing & Community

Appendices

- *Neighbourhood Plan Projects*
- *Community Assets*
- *Local Green and Spaces Designation*
- *Non-Designated Heritage Assets*
- *Policy Maps*



01 THE CIRENCESTER CONTEXT

This section explores the origins of the town, the activities and events from history that influenced and shaped the town we know today.

The narrative sets the scene and describes the context for the development of the Cirencester Neighbourhood Plan.

Cirencester Neighbourhood Plan - Submission Version | Reg 16



01

THE CIRENCESTER CONTEXT



1.1 Often referred to as the Capital of the Cotswolds, the compact market town of Cirencester lies in Gloucestershire, just 5 kilometres from the Wiltshire border. To the south and east are the 180 lakes of the Cotswold Water Park, now known as the Cotswold Lakes, whilst immediately north and west is the Cotswolds National Landscape (AONB).

1.2 It is the largest town in the Cotswold district, comprising around a quarter of its population and providing almost a third of the jobs. It is an important centre of business, finance, retail, and public services both for the district and surrounding area. In 2023 the Sunday Times identified it as the best place to live in the South West of England.

1.3 Cirencester occupies an area of approximately 416 hectares. Beyond the historic centre, the town includes the Victorian settlements of Watermoor and parts of Stratton with the 20th century residential suburbs of Chesterton and the Beeches.

1.4 Cirencester is connected by major and minor road links to the nearby cities of Bath, Bristol, Cardiff, and Oxford, supported by the M5 and M4 corridors. Cirencester is 130 kilometres west of London, 20 kilometres north of Swindon and 18 kilometres east of Stroud.

THE LANDSCAPE

1.5 Cirencester lies on the lower slopes of the Cotswold hills sitting in the valley bottom of the River Churn, surrounded to the north and west by the Cotswold Hills. To the south lies the relatively flat expanse of the Upper Thames Valley. Natural drainage is into the River Churn, a tributary of the Thames, which flows roughly north to south through the eastern side of the town connecting with the Abbey Lake and joins the Thames near Cricklade 13 kilometres to the south. Its natural course was altered by the Romans and parts later covered.

1.6 A small tributary of the Churn, the Daglingworth Brook, drains the area around the north-west of the town. The low levels and river course have contributed to repeated flooding within the town, aggravated by post-industrial expansion of the urban environment with Flood Zone 3 (a 1 in 100 occurrence including functional flood plains) covering extensive areas at Stratton Meadows, Kingsmeadow and along the inner ring road.

1.7 Wrapping around the northern and western edges of Cirencester is the southern edge of the Cotswolds National Landscape (AONB). To the north-east of the town lies the Special Landscape Area (SLA) of Hare Bushes and Tar Barrow, designated on the grounds of its locally significant and attractive landscape.

1.8 Within and away from the historic town centre a variety of green spaces such as City Bank Nature Reserve, Cirencester Park (Grade I listed) and the Amphitheatre form green corridors and recreational spaces that reach deep into the town centre. Cirencester Park to the west is a private estate that dominates the landscape and provides access for individuals and families with a Community Pass, Day Pass or Annual Pass. To the east is the Abbey Grounds, tucked behind the Market Place and the Parish Church of St John Baptist.

DEVELOPMENT OVER TIME – AD49 TO 2023

1.9 Cirencester is known to be an important early Roman settlement with a fort built in the area approximately AD49. It was probably located to be close to a major Iron Age settlement of which traces remain at Bagendon and the nearby Tar Barrow. It was also the point where the Fosse Way (connecting Lincoln and Exeter) crossed both the River Churn and Ermin Street (connecting Gloucester and Silchester). A Romano-British community grew up around the original fort, under the name of which, Corinium Dobunnorum, was shortened to Corinium. It became second only to London in area.

1.10 The modern name Cirencester came from the cognate root Ciren (after the River Churn) with '-ester' indicating a roman fortress or encampment. By the end of the First Century AD the town had a Roman street grid with public buildings, basilica and forum surrounded by a wall, probably originally earth, later stone in the 3rd Century, with four gates that enclosed its 100 hectares. This infrastructure effectively contained the town to the west of the River Churn and ensured a compact, higher density town grew within the confines of the wall. An Amphitheatre sat outside, the remains of which along with parts of the town wall can still be seen today.

1.11 Substantial Roman cemeteries have been discovered outside the town's gates, particularly at Watermoor and Bathgate. The Roman population was thought to be about 10,000, only half that of the modern town. The Roman influence on the town remains in key parts of the road network, landscape, and underlying archaeology. Much of the town is an area identified as a sensitive scheduled monument with previous excavations revealing floor mosaics and various artefacts many now held in the Corinium Museum.

1.12 The town continued to function in the first part of the 5th Century, but archaeological evidence suggests that by the 6th Century much of it had been abandoned with no more than a few wooden huts.

1.13 The town was captured by the Saxons in 577 AD and later it is known that Guthrum based his Danish Viking army here for a year in 879 AD after the battle of Edington when it became a frontier settlement for the Kingdom of Mercia.

1.14 By 1086 there were references in the Domesday book to the "new market" in the settlement of Cyrescestre followed by the founding of St Mary's Abbey by Henry I and the establishment of St John's Hospital by Henry II in 1133. The Abbey, which was built on the site of a major Anglo-Saxon church, was dedicated in 1176. Its great wealth stemmed from its vast land holdings in the town and charters. Today the Norman arch in the Abbey Grounds is a remaining feature.

1.15 By the 12th Century the construction of the present Parish Church of St John Baptist had begun and whilst there were many struggles between the townsfolk and the Abbey to establish a borough or guild distinct from the controls of the Abbey, the town enjoyed considerable prosperity from the fourteenth century onwards as the principal outlet for Cotswold wool and as a central market town. Many traders gained wealth and prosperity, some of the proceeds of which replaced many of the timber framed buildings with stone; today the former Weavers Hall in Thomas Street remains a distinct example.





1.16 The medieval street pattern of narrow, winding streets surrounding the Market Place, dates from this period. Among them the medieval pattern of land holdings evolved, based on burgage plots, long and narrow to reduce tax. These also remain. Notable roads included the 'Welsh Way' used by drovers taking cattle from Wales towards Oxford and London, with the 'White Way' serving Roman villas in the North Cotswolds, it was also part of the 'Salt Way'. Much of the area north and south of the Town was given over to water meadows, carefully controlled grassland which took the river's floodwaters in the winter and provided rich grazing to fatten sheep during the spring and summer. The population around this time was 2,500.

1.17 In 1539 Henry VIII ordered the demolition of the Abbey as part of the dissolution of the monasteries and the Abbey's property redistributed. In 1564 the Abbey Grounds on the east side of the town was sold to Dr Richard Master, the Queen's personal physician, and in 1695 the Oakley Estate to the west side was purchased by Sir Benjamin Bathurst, for his eldest son Allen, who became the 1st Earl Bathurst. The two families were to have a profound influence on the landscape of the town with the development of the private estates based around Cirencester Mansion and Abbey House.

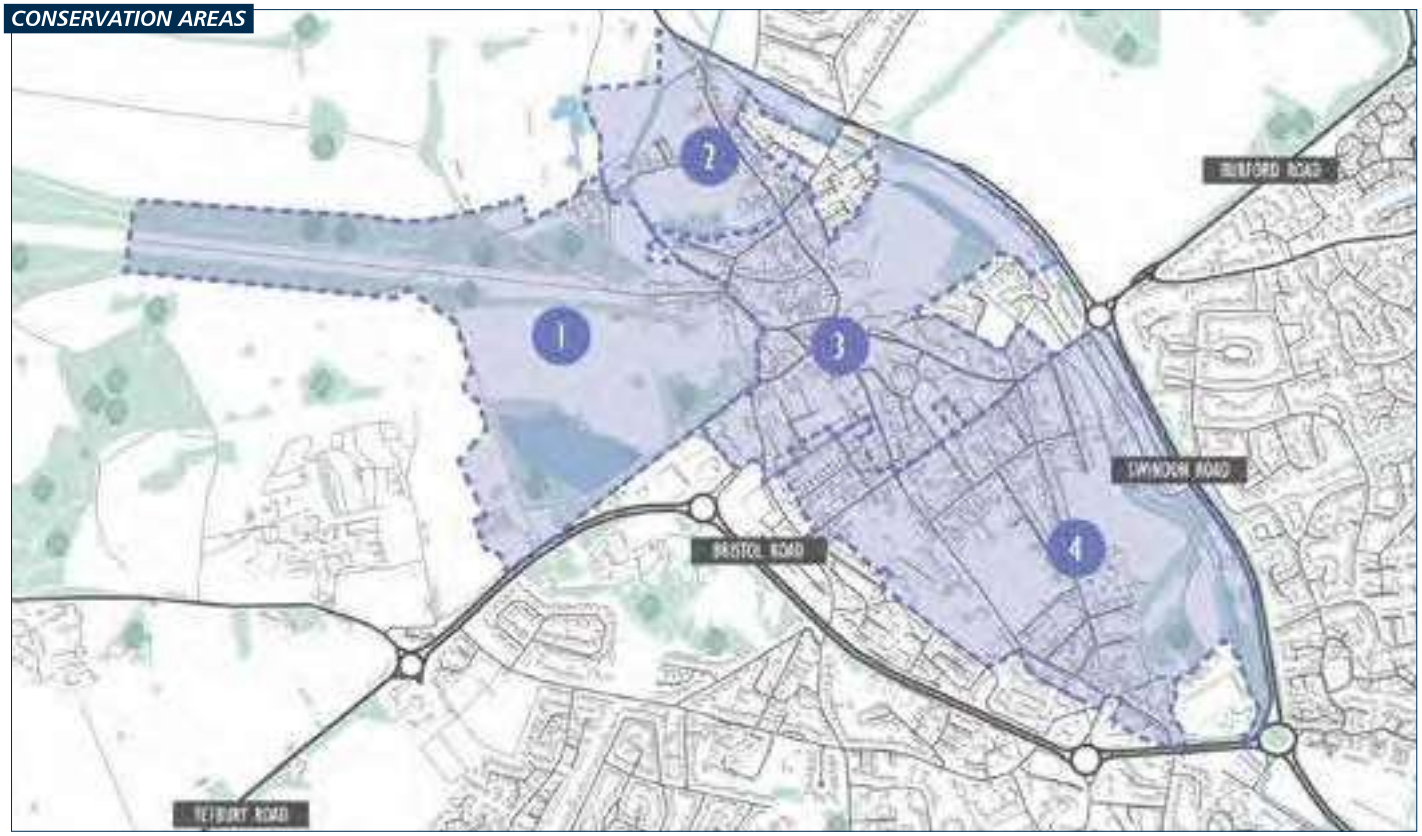
1.18 The 17th Century was a time of conflict with Civil War. Cirencester was on the Parliamentary side and in 1642 the coach of Lord Chandos arriving in the town to enlist men for the King's service was destroyed, the first overt act of Civil War violence. In 1643 the town was stormed by Royalist troops led by Prince Rupert. According to some accounts several hundred local people were killed in fighting or summarily executed.

1.19 The economy of the 18th Century was dominated by corn rather than wool trade and industrialisation. Cirencester remained important as a market and providing services to the surrounding area. Many of the honey-coloured stone buildings in the town date to this period. The opening of the local spur of the Thames and Severn Canal in 1789 meant water moved heavy haulage such as coal, timber, and salt. The establishment of seven turnpiked roads enabled rapid movement of mail and travellers, with London now reachable in a day. Today the canal has been built over and little evidence remains. The population in 1800 was about 4,000.

1.20 In 1841 the railway line opened taking passengers to Kemble for onward travel to the Great Western railway at Swindon. The station house at Cirencester was designed by Brunel and is the only part of the railway now remaining. The Midland and South Western junction opened in 1883 at Watermoor Station, linking Cirencester to the Midlands. Housing expansion followed with the town well served by its roads, two railways and canal network.

1.21 Major redevelopment of the Market Place took place around this time with buildings cleared to widen the space. The Corn Hall was opened in 1863 alongside the new Kings Head Hotel. A subscription library was also established.

1.22 In 1870 the public outdoor swimming pool opened off the river walk, one of the first in the country, a water works office was established on Lewis Lane to administer the new water supply to the town and education became compulsory. The grammar school which had opened in 1461 now moved to new buildings on Victoria Road and merged with the high school for girls, although the sexes were still separated. The Blue School (for boys) and Yellow School (for girls) also merged to form what is now known as Powell's Primary School. The private Royal Agricultural College was established on the outskirts of the town in 1845.



1.23 The 20th Century saw leisure, culture, and arts expand through the philanthropy of Daniel Bingham who established a public library in 1905 at Bingham House, Dyer Street and in 1908 the Bingham Hall on King Street for lectures, concerts, and drama productions. The population was then about 8,000.

1.24 During the Second World War, the town's rifle range on the Stroud Road and some of the neighbouring parkland became two large American D-Day hospitals set up in advance of the invasion of Europe to treat potential casualties. The Nissen huts of the hospital were later used for education before the building of the later Deer Park School.

1.25 Post-war housing built on land owned by the Bathurst and Chester-Master families created the newer residential areas of Chesterton and Stratton and the old Golden Farm land became the Beeches. The railway was closed following the Beeching report of 1963 and in 1975 the library moved to The Waterloo from Bingham House and employment opportunities extended to the new Love Lane industrial estate.

1.26 The removal of the railway lines created space for a new ring road. While benefitting road transport it created a significant barrier between the town centre and its suburbs, referenced within the Plan as the Ring Road Effect, allowing traffic at higher speed through the town creating potential for greater noise, air pollution and impact on the health of those living in the town. The dualling of the A417 in the 1990s enabled faster journeys to the M4 and M5 but cut the town off from countryside to the east. Also in the 1990s the historic Cattle Market closed to make way for the town's new leisure centre. The population was now 15,000.

1.27 The first quarter of the 21st Century saw a changing high street with the closure of traditional shops and a department store. The town also lost its cinema on Lewis Lane in 2003-04. St James's Place Wealth Management extended its presence and employment opportunities within the town with its new headquarters. There was also substantial residential growth at Kings Meadow and Chesterton and two further supermarkets. The town continued to retain its Charter Market status and saw further town centre improvements in 2017, with growth in markets and events, strong independent retail and improving footfall. The population in 2023 was circa 20,000 and is projected to grow rapidly during the next decade through The Steadings strategic housing and employment development.

HERITAGE LANDSCAPE AND BUILT ENVIRONMENT

1.28 Geologically oolitic limestone dominates the rock of the area and gives the town its distinct architecture and appearance from quarried stone. This local limestone has given a distinct identity to many of the earlier building types with a distinct change in architectural character recognisable between the northern and southern parts of the town, with few if any being listed on the later 19th and 20th Century roads of Stratton, Chesterton and Watermoor.

1.29 Many 20th Century developments, whilst often providing practical solutions to everyday needs, are seen by some to have diluted the design character of the town. In particular, the demolition and redevelopment of the southern end of the Market Place, the Forum and Dyer Street and parts of the Roman Querns Road. Similarly, the Abbey House within the Abbey Grounds, home of the Chester-Master family, was demolished in 1964 and replaced with a block of flats, considered by some to be lacking in sympathy to the context.

1.30 Developments such as these resulted in later developments meeting the needs of the user while also paying due regard to their context and setting. For example, Cotswold stone elevations are reproduced residentially where appropriate while centrally the newer style and flat roofs of St James's Place and Bath Gate Place sit sympathetically within the historic setting of the Brunel's Station House of 1841. Cirencester College opened its new Digital Skills and T-Level buildings, featuring green and blue roofs, in 2022 and 2023.



1.31 The iconic St John Baptist Parish Church with its tall tower in Perpendicular style, dominates and forms a major landmark viewed from many aspects including the approaching town vistas. Views from the historic roads and avenues are unlikely to change but changes to redundant central buildings and any raising of commercial rooflines could, unless protections are introduced, compromise this focal point of the Market Place.

1.32 Cirencester is within and immediately adjacent to a number of environmentally sensitive and valuable areas which are protected on various levels from development through planning policy and environmental designations.

1.33 Wrapping around the northern and western edges of Cirencester is the Cotswolds National Landscape (AONB) which protects its special landscape qualities from harmful impacts from development.

1.34 Much of Cirencester is covered by four Conservation Areas (see Map on Page 10) which act to protect many centuries of historic development within the town centre, around Cirencester Park, Gloucester Street and Riverside Walk, and to the south of the town.

1.35 Furthermore, Cirencester comprises many Listed Buildings; the special architectural or historic features of which must be protected. Within the Cirencester Town Centre Conservation Area there are 179 listed buildings, two of which are Grade I listed, alongside nine Grade II* (two star) and 168 Grade II listings.

1.36 The historic designed landscape of Cirencester Park, an impressive swathe of Grade I historic parkland, lies to the west of the town. The park was laid out in collaboration with the poet Alexander Pope who also designed the building known as Pope's seat. To the east lies the Abbey Grounds incorporating parts of the Roman wall and the Norman arch.



1.37 The North Cirencester Special Landscape Area (SLA) lies to the northeast of the town and is designated on the grounds of its locally significant and attractive landscape, of comparable quality to areas of outstanding natural beauty. This area includes the visually and archaeologically sensitive Hare Bushes and Tar Barrow.

1.38 The influence of Cirencester's Roman period is, in the present day, felt mostly by the constraints it poses to development with many archaeological deposits lying close to the surface. Cirencester Amphitheatre, also known as the Bull Ring, is one of the largest known surviving examples from Roman times, built just outside the walls of the town in the early 2nd Century.

1.39 This area, alongside further large swathes of Cirencester are designated as Scheduled Monuments (SM) under the Ancient Monuments and Archaeological Areas Act 1979 which acts to ensure the resources are not needlessly destroyed or damaged.

DEMOGRAPHY AND HOUSING

1.40 The 20,200 population of Cirencester in the 2021 Census showed an increase of approximately 1,000 from 2011 with a slightly higher ratio of females than males, 95% identifying as white British. The town has an above average proportion people of 65+ years for England (23.4% vs 18%) although lower than the average for the Cotswolds. Conversely, the proportion aged under 15 at 14.7% is lower than the England average of 17%. The overall population is projected to rise considerably during the next decade on the completion of over 2,000 new houses at The Steadings strategic development.

1.41 There are 1,125 students of the Royal Agricultural University (RAU) who are temporary residents within the local community, mostly living off-site in local rented housing. This includes family homes converted for multi-occupancy housing. Future provision of student accommodation should be considered as part of the RAU's masterplan for an 'Innovation Village'.

1.42 63% of the housing stock in Cirencester is owner-occupied with the average house price being £388,000 (Rightmove, 2023). The demography of Cirencester highlights pressure on existing housing with limited entry level housing for young people or for older residents unable to downsize.

1.43 The affordability of entry-level housing is at odds with household income and the subsequent purchasing power which it allows with the average individual salary in Cirencester being £33,171 (2022). This contributes to an ageing demographic,

skills shortages and increasing demands on primary care health services with frequently advertised jobs being in engineering and hospitality.

1.44 In common with the rest of Gloucestershire (GFirst LEP Local Industrial Strategy) there is a net loss of young people over 18 from the town.

LOCAL GOVERNMENT

1.45 An Urban District Council (UDC) replaced the Local Government Board in 1894 which managed the town's affairs. In 1974, local government reorganisation replaced the UDC with the two-tier governance of Cotswold District Council (CDC) and Cirencester Town Council (CTC). Gloucestershire County Council (GCC) layers this further with responsibility for transport, highways, health and social care, and some primary and secondary education.

LOCAL ECONOMY

1.46 Cirencester is best known as a market town but has a diverse local economy. With almost 500 businesses it provides a wide range of services to the local area as well as the wider economy. Almost 14,000 jobs are provided in the town with significant numbers of daily commuters from Stroud, Swindon, and North Wiltshire (Source: Cotswold District Council Economic Strategy). Unemployment is low and public sector employment is below national averages while productivity and levels of self-employment and homeworking are significantly above national averages. Employers in all sectors struggle to recruit with hospitality, digital and engineering especially problematic (Sources: Cotswold District Council/GFirst LEP/ Gloucestershire Local Skills Improvement Plan). Key worker roles are also hard to fill.

1.47 Larger employers include St James's Place Wealth Management, Corin Medical, several specialist IT, business support and engineering firms, Cirencester College, the Royal Agricultural University (RAU) and Cotswold District Council. However, these are the exceptions. Almost 90% of firms are micro



businesses employing fewer than 10 people with the remainder mainly small companies with 10-29 employees. Gloucestershire has a high proportion of start-up businesses with a concentration around Cirencester. Key local assets are the Growth Hub which provides advice and support to businesses and Farm491, a leading innovation space focused on the future of farming and food systems; both are based at The Alliston Centre, which forms part of the RAU.

1.48 The town centre has a strong emphasis on hospitality and retail with independent shops being central to its attractiveness. This has been enhanced by the increase in the number of markets. While footfall in the town has held up better than most in the past decade there are several vacant stores, particularly larger units. While the number of cafes in the town has increased, Cirencester has lost over half its pubs since 1990.

1.49 There are several satellite retail areas on the east side of the town including co-working spaces for start-ups, such as Watermoor Point. This is also the main industrial area, which extends to Love Lane, with circa 150 businesses. Planning for these areas has not accommodated economic growth and has resulted in congested cul-de-sacs and poor connectivity to the town and other outlying industrial areas, such as in South Cerney.

1.50 The local economy was impacted by the Covid-19 pandemic, hospitality suffering from absent tourism and normal retail foot traffic. Being slow to adapt to a digital or online presence, research locally showed few embraced social media to market their business. However, during 2021-22 the local economy bounced

back, and research showed Cirencester recovered more quickly than other local towns (Source: Cotswold District Council Economic Forum).

THE TOWN CENTRE

1.51 The town centre lies in the northern quarter of the town with a dedicated Market Place, two enclosed arcades at Bishops Walk and the Corn Hall, retail areas such as Black Jack Street, Castle Street and Cricklade Street and courtyard areas such as Swan Yard and the Woolmarket. It is characterised by a variety of shops from national retail chains to quaint independent stores that contribute to the town's attractiveness.

1.52 The part-pedestrianisation of the Market Place has enabled an increasing number of markets and other events to take place which have enhanced the town centre. The twice weekly Charter Market is the oldest in the country supplemented by the twice monthly Farmers' Market, arts and crafts markets and themed fairs. The Corn Hall hosts weekly Craft & Antique Markets and once a year there is a Food & Drink festival that weaves through the streets and extends to Abbey Grounds. Nearby car parks usually reach capacity at the weekend showing the town is a popular economic centre.

1.53 The 2018 Cirencester Town Centre Health Check reported the town centre to be one of the top 200 retail centres in the UK and the principal shopping and leisure destination in the Cotswold District. The report highlighted year-on-year growth in units and floor space, a strong retail service offer, and adequate leisure service offering. Whilst vacancy rates were below the national average in 2018, there has been a local decline in national chains including House of Fraser in 2019 and a downsized Tesco in the town centre in 2023, which led to some large units standing empty.

TOURISM

1.54 The town centre is an important tourist destination with strong links to both the Cotswolds and Cotswold Lakes, with various places for overnight stays. Visitors to the Cotswolds, as a region, are considerable in number and many British tourists spend time in Cirencester, assisted by tourist information at the Corinium Museum and the Local Information Centre at Bingham House.

1.55 With over 5 million day visitors to the Cotswold District and half a million staying visits, with a total tourism spend of £336 million (Source: Cotswold Tourism Economic Impact Study 2022) there is an opportunity for Cirencester to develop a Tourism Strategy balanced with the needs of the local community.

ROADS AND TRANSPORT

1.56 Cirencester sits at the intersection of four A roads. The A419 dual carriageway allows rapid access south to Swindon and the M4. To the north the congested A417 will allow rapid access to the M5 and Gloucester once the 'missing link' at Birdlip is completed. East and west the roads are much slower towards Stroud, Malmesbury, Tetbury and Fairford with limited pavements and no dedicated cycling lanes. Road traffic is often heavy around the town at commuter and peak times, leading to congestion and air pollution at various pinch points.

1.57 The nearest mainline station is Kemble about 5 miles south, used to London by commuters and some leisure travel. Travel from the town to Kemble Station is overwhelmingly by car. The nearest airports are Bristol (60 miles), and Birmingham (73 miles), the local Cotswold Airport 4 miles outside the town is a private business with no current commercial flights.

1.58 Public transport is served by limited bus services from the Forum Car Park and regular National Express coach services to Heathrow and London from the Beeches Car Park. There are private taxi firms although the number has declined and there is no Uber service. Reduced bus services that do not connect with rail links from Kemble or a night-time service to larger towns such as Cheltenham has meant an almost total reliance on the car, migration of non-drivers to towns and cities that have a stronger public transport network and high demand on the car parking in the town.



1.59 Today, Cirencester has above average rates of multiple car ownership per household (28.4% vs 26.3%) although it also has almost double the national 'walk to work' rate at 14.4%. In July 2022, Gloucestershire County Council published a Local Cycling and Walking Infrastructure Plan for Cirencester, which for the first time outlines a programme of walking and cycling infrastructure improvements.

1.60 A lack of connected public transport to and from local education facilities means local roads can become congested at peak times.

COMMUNICATION

1.61 High speed broadband is available in most of the town with fibre networks expected by 2025, currently being delivered within The Steadings development. Mobile phone coverage remains patchy.

EDUCATION AND SKILLS

1.62 The town has strong education and academic provision at every level and this Plan acknowledges the value and contribution that each institution makes to the life of the town.

1.63 Deer Park School was established in 1966 as a comprehensive, bringing the town's secondary education together in one place. The growth of the town led to a second comprehensive opening at Kingshill in 1976. In 1991, Cirencester College was established to provide sixth form and adult education. In 2013, the Royal Agricultural College was awarded university status and today the RAU, alongside Deer Park School and Cirencester College, is collectively known as the education quarter.

1.64 There are five primary schools within the town with another being built within the new strategic housing development of The Steadings. Paternoster School, is a special school for pupils aged 4 to 16 supporting children with severe learning difficulties and mental health learning disabilities.

1.65 There is considerable movement of pupils in and out of Cirencester at ages 11 and 16 reflecting student and parental choice in the region. In 2022, 2,395 students commuted daily into Cirencester from outside the town (Source: Cirencester College).

1.66 Cirencester College provides an extensive range of A-Levels, T Level provision and digital skills, as well as Apprenticeship programmes, engaging with local employers on the curriculum to support the local job market and meet local skills gaps.

1.67 The RAU is a forward thinking and innovative academic institution providing undergraduate and post graduate opportunities in agri-tech, rural business and environmental studies.

1.68 The town has wide ranging community infrastructure which supports the quality of life including:

1.68.1 a minor injuries hospital with day surgery and allied health service provision such as screening and physiotherapy, downgraded from an accident and emergency facility;

1.68.2 three GP practices operating out of four premises;

1.68.3 ten allotment sites managed and owned by three different owners, most with waiting lists;

1.68.4 a community garden at Thistle Park, Chesterton and Monastic Garden in the Abbey Grounds;

1.68.5 a public library close to the Market Place;

1.68.6 provision for most faiths with 51% identifying as Christian, as well as various community buildings;

1.68.7 various public houses, although fewer outside the town centre.

SPORT, ARTS AND CULTURE

1.69 Sport is well supported within the town with teams representing football, netball, bowls, rugby, cricket, and athletics. Facilities exist at various points in the town, some requiring membership with indoor sport at the Leisure Centre, and Cirencester Arena at the Corinium Stadium. Polo is played privately at the Cirencester Park Polo Club.

1.70 The town has two theatres, the Barn on Beeches Road, and the Sundial at Cirencester College. In addition, Bingham Hall is used for ad hoc drama and local productions and occasional live music and comedy is hosted by several venues in the town.

1.71 Whilst the town's cinema closed in 2003 and plans to replace it have not materialised, the Barn, and other venues do show cinema films, including the Corinium Museum which also streams live ballet and opera performances from Convent Garden, London.

1.72 Craft workshops are held at New Brewery Arts on a regular basis where artisans create, display, and sell their work.

COMMUNITY TRADITIONS

1.73 Cirencester enjoys several traditions that add to the richness of local living and a sense of community. Within the life of a historic charter market town key events such as Remembrance Sunday and Christmas are supported by summer concerts in the Abbey

Grounds, the Cotswold Show at Cirencester Park and the annual visit of the Mop Fair and Giffords Circus. The historic Town Crier and local newspaper represent the value residents place on legacy. In 2018, the town collectively formed a human poppy to commemorate 100 years since the end of World War I, breaking a previous record and so entering the Guinness book of records.

1.74 Cirencester's Christmas tree takes pride of place just outside St John Baptist Parish Church in the Market Place, standing at approximately 40 feet. The switching on of the town's Christmas lights is combined with silent fireworks and an Advent Market that weaves through the town centre.

1.75 The Mop Fair returns to Cirencester for two consecutive Mondays every October; with three Mop's taking place, if one of those Mondays falls on the 11th. The Fair dates from the time of Edward III in 1351 to regulate the labour market. The same family have brought the fair to the town for the last century, and it is a much-anticipated event popular with families and young people.

1.76 Established in 1988, the Cotswold Show held in Cirencester Park is a two-day summer event attracting over 25,000 visitors with a mix of family entertainment, activity arenas, and 200 trade stands and food stalls. Showcasing the best of rural life and the British countryside, the event brings substantial trade and economic benefits to the town.

1.77 The Phoenix Festival is a two-day community music and arts event. It was established in 2013 by a local youth initiative called Ozone as part of a social enterprise to help young people develop self-confidence and business skills. Originally intended as a one-off, today the festival is held annually in the Abbey Grounds over the August Bank Holiday weekend with free entry. It is run by a team of volunteers in partnership with the Cirencester Community Development Trust and Cirencester Town Council and attracts thousands of people.

1.78 Historically town criers – or Bellmen as they were sometimes called – were the original newsmen. The Town Crier of Cirencester was a well-known local figure up to circa 1884. Tradition was re-established when a new appointment was made by the Town Council in 2019.

1.79 Established in Malmesbury in 1837, the Wiltshire and Gloucestershire Standard newspaper moved to Cirencester in 1840 with its printing shed on the corner of Lewis Lane and Dyer Street, publishing regional stories of interest with family announcements and local events. The paper merged with its competitor, the Cirencester, and Swindon Gazette, in 1852 and in 1904 moved to purpose-built offices and printing rooms at 74 Dyer Street. Circulation extended to London and over the years was the main method for residents to learn their local news through both wars and into the 21st century. The digital evolution and establishment of an online version meant the offices closed in 2017 and printing is now done outside the town, but for nearly 200 years this local newspaper was an important aspect of life in the town.



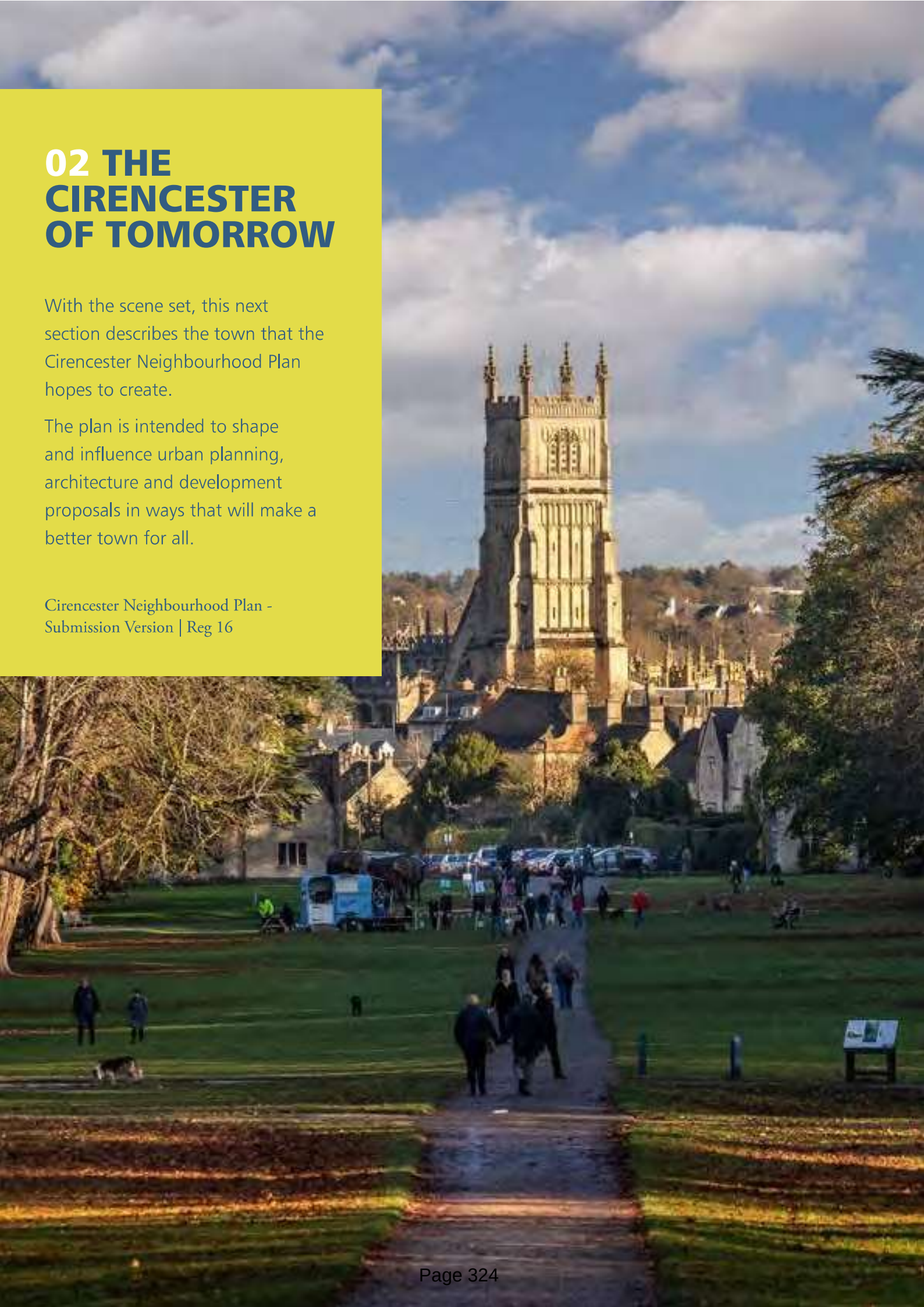


02 THE CIRENCESTER OF TOMORROW

With the scene set, this next section describes the town that the Cirencester Neighbourhood Plan hopes to create.

The plan is intended to shape and influence urban planning, architecture and development proposals in ways that will make a better town for all.

Cirencester Neighbourhood Plan - Submission Version | Reg 16



02

THE CIRENCESTER OF TOMORROW

2.1 The growth and development of Cirencester has occurred in phases: each leaving a distinct pattern of urban form which is expressed in the layout of streets, the scale and architectural style of the buildings and the materials used. The town is currently undergoing another period of growth. To inform how this growth will develop and capture the opportunities that this brings, the Neighbourhood Plan recognises that while the town must grow, this needs to be accommodated in scale, design and sustainability whilst adapting to emerging trends.

2.2 The Covid-19 pandemic caused significant changes to the local economy, businesses, retail, working and shopping patterns and the leisure and tourist industries. The legacy of the pandemic continues to evolve and the extent to which we return to pre-pandemic patterns of life remains to be seen.

2.3 During the pandemic, the value of green open spaces close to where we live for improving and maintaining the physical and mental wellbeing of the population was evident. The importance placed on open space for sport and recreation, to walk and cycle locally, and live active and healthy lifestyles became even more important and planning has a vital role to play in providing, improving, growing and maintaining access to these open spaces and activities into the future.

24 Growth must also deliver the infrastructure and facilities needed for business, education, health and community whilst retaining the town's distinct and historic character. The Cirencester of the future must capitalise on its heritage, location, and identity to maintain itself as a vibrant market town and a great place to live, work and visit.



CLIMATE CHANGE AND FLOODING

2.5 There is overwhelming scientific consensus that the climate is changing and in 2019, Cirencester Town Council declared a climate emergency. The impact of climate change and the associated increase in energy in the atmosphere will be significant, including hotter summers, higher rainfall, and more frequent and extreme weather events. The consequence of this includes increased flooding, more droughts and health risks from higher temperatures. This continues to be evidenced in the most recent reports from the Intergovernmental Panel on Climate Change and the UK's Climate Change Committee (CCC), an independent body formed to advise the UK Government on tackling and preparing for climate change.

2.6 The UK's national commitment to mitigate climate change is set through the Climate Change Act 2008 which legislates that the UK achieves net zero carbon by 2050. Cotswold District Council declared a climate and ecological emergency in 2020 and set out priorities including carbon neutrality, also called net zero, where emissions are significantly reduced with remaining emissions balanced by natural processes which remove carbon from the atmosphere.

2.7 It is important that Cirencester adapts to, and mitigates, the impacts of climate change, contributes to the national target of net zero, and recognises the opportunities for the town during the Plan period and beyond.

2.8 Parts of Cirencester are particularly vulnerable to the impacts of climate change, including flooding. The town lies on the River Churn and Daglingworth Stream floodplains, with flood zones covering extensive areas at Stratton Meadow, Kingsmeadow, and alongside the inner ring road, effectively separating the main part of the town from Beeches, Kingshill, Bowling Green and Stratton. Consideration needs to be given to flood mitigation up-river of the town while, at the time this Plan was being prepared, the sewers are inadequate to cope with rainfall especially those serving Chesterton and the Abbey area, alongside issues relating to foul water getting into the River Churn. The problems of rapid run-off and the discharge of foul water into the Churn also need to be addressed.

IMPROVING ACCESS AND MOVEMENT

2.9 Cirencester suffers from poor public transport provision and over- reliance on cars for transport. In a rural area, cars are important, but their dominance has negative consequences for health, safety, air quality and congestion.

2.10 Alternatives to car travel are limited. There is a good coach service to Heathrow and London but nolocal links to Oxford or Bristol, for example. The narrow and congested streets of the town are also unattractive to regional operators because of the delay to services. Only a few buses connect to trains at Kemble while in the local region bus connections are infrequent, slow, and rarely operate in the evening or weekends. There is no central place to transfer from one route to another or from one mode to another such as cycling or taxi to bus. Consequently, buses are underused.



2.11 Proposals for a light rail link to Kemble Station and Cirencester College's arrangement with Stagecoach which brings over 22 double-deckers into the town several times a day offer opportunities to develop provision.

2.12 The A417 and A429 dual-carriageways allow traffic to travel through the town at the national speed limit of 70mph although they can also be congested and at times gridlocked during peak school-run, commuting times and major events. This creates noise and air pollution in the town but also cuts the town centre off from most residential areas and limits opportunities to walk and cycle, known as the 'Ring Road Effect'.

2.13 This 'concrete collar' has the severing effect of cutting off the town centre from the surrounding areas and crossing it is challenging with only limited points of access to do so. This makes walking and cycling into town a dispiriting experience and many people who choose to live close to town will choose to drive instead. This exacerbates the parking and congestion problems experienced in the town centre.

2.14 Cirencester lacks safe walking and cycling routes, particularly between residential areas and education provision. Pedestrians and cyclists face crossing busy roads using unpleasant underpasses and narrow pavements. It is a particularly challenging environment for those with mobility issues or young children.

2.15 Residents living on the edge of town can feel detached if these barriers are not overcome by ensuring daily needs are met easily and safely on foot or by cycle.

2.16 In a rural area and a town not served by a railway, visitors and commuters will, in the main, arrive by car. The challenge is to emulate the new Bathurst Estate car park off the Stroud Road by providing long and short-stay parking towards the periphery.

2.17 Although maps show two long-distance Sustrans cycle ways passing through the town, neither provide safe routes to the countryside or neighbouring settlements. There are no safe cycling routes into the countryside which remains inaccessible to most cyclists including young people. This has an impact on wellbeing and recreation, long-term health, cycle commuting and long- distance cycle tourism. The route to Kemble Station is particularly problematic where there are no cycling paths along busy highways.

2.18 Potential safe routes to the countryside to the west and south (the Cotswold Lakes) are limited by land ownership issues while the town's only long-distance footpath (MacMillan) requires walkers to cross one dangerous road and walk along an extremely narrow pavement beside another one.

2.19 The National Planning Policy Framework requires consideration of transport at the early stages of proposed development with far greater emphasis to improving health, reducing air pollution and congestion, and promoting sustainable travel. In July 2022, Gloucestershire County Council published a Local Cycling and Walking Infrastructure Plan (LCWIP) for Cirencester which for the first time outlines a prioritised programme of infrastructure improvements for future investment. There is an opportunity to develop other transport options alongside car use and to promote active travel.

ENSURING A THRIVING TOWN CENTRE

2.20 While Cirencester has fared better than most, the town has suffered from increasing numbers of vacant shops and the related competition from online stores. To ensure a vibrant and attractive town centre both for residents and visitors opportunities need to be taken to preserve and encourage a diverse range of retail and hospitality outlets including retaining the remaining pubs. Amongst residents there is a desire for a well-managed evening economy including cinema and live music.

2.21 It is important that Cirencester's historic character, architecture and charm is sensitively retained whilst the town grows over the Plan period and beyond, and the Neighbourhood Plan will ensure that this is possible whilst adapting Cirencester to meet its future needs.

2.22 While tourism contributes to the town, the potential of Cirencester's history and environment is not fully realised. More could be done to promote the town and to make it easier for visitors to reach key features such as the Amphitheatre. There is no obvious place for coaches to drop off, and collect, visitors or to park outside the centre.

2.23 However, if not properly managed, tourism could have an adverse impact on the town's environment and the daily life of local people. The challenge is to enable and manage sustainable tourism, which will safeguard the countryside, heritage and culture for future generations while providing benefits to the local economy.

ENSURING SUFFICIENT AND APPROPRIATE HOUSING WITH SOCIAL INFRASTRUCTURE

2.24 Cirencester is currently providing a quarter of the Cotswold District allocation of new homes via The Steadings development. Within the boundaries of the town, most remaining space is either important green open space or flood plain.

2.25 The main challenge facing Cirencester is to plan for future development requirements in the most sustainable way possible, making provision for homes (particularly for people with a local connection), jobs and community facilities, while protecting the area's outstanding natural and built environment.





2.26 We need to address the shortage of affordable homes to rent or buy, especially for key workers who are vital to the community, and starter homes for local young people. Providing affordable housing will stem the outflow of young people from the town.

2.27 The attractiveness of the area has also led to growing numbers of second homes and holiday lets. 1 in 18 houses in the Cotswold district fall into these categories. We need to ensure that second and holiday-let homes are planned and managed appropriately so as not to leave the local community being 'hollowed out' leaving few facilities and no room for local people.

2.28 There is some potential for re-use of pockets of brownfield sites around the town for low-rise housing and for the use of upper floors of retail premises in the town centre as flats. Planners will need to look to the flexible use of redundant commercial buildings particularly as retention of the skilled young is essential for the town's future.

2.29 Future development needs to be connected with the town centre and whilst improvements are planned for delivery through The Steadings development, overall, the town lacks 'spokes' of safe walking and cycling routes between residential areas and the centre and public transport within the town is poor. Without change this will lead to residents driving into the town which makes problems of congestion and parking worse.

2.30 The growth of the town in recent years has not always been matched by growth in the community infrastructure people need. Of particular concern is primary care provision and ensuring that the public have access to a local GP and doctor, in-line with population growth. There has been no new health provision on any of the new housing developments built since the 1960s. Indoor leisure facilities are also stretched. The town's Leisure Centre is at capacity and there are few publicly accessible indoor sports facilities.

ECONOMIC DEVELOPMENT AND SKILLS RETENTION

2.31 Cirencester is located on the edge of Gloucestershire and close to the Wiltshire border; with the dominance of Gloucester and Cheltenham this means that it is rarely the focus of county level economics, despite its position in the Cotswold district. Digital, green, and agri-tech sectors have been prioritised for the local area along with encouraging innovation and business start-ups.

Financial and business services also expect significant growth. It is important that Cirencester can make a case for its own economic interests to ensure that it secures high-value growth as identified within Cotswold District Council's Local Plan economic development strategy and Policy EC4 Special Policy Area.

2.32 There is a shortage of industrial space for existing business to grow into with demand likely to increase once the A417 'missing link' is completed. There is



some provision for employment land as part of The Steadings development and the proposed Innovation Village at the RAU.

2.33 Within the town centre there are concerns about the loss of retail outlets and pubs. A vibrant centre is widely seen as key to the town's future and a strategy is required to strengthen it for the future. There are opportunities for the visitor economy to evolve into an all-year destination and to exploit Cirencester's heritage and links to the Cotswold Lakes (formerly known as the Cotswold Water Park) more fully, but these will require infrastructure improvements.

2.34 Despite the roll out of superfast broadband across much of the town, some infrastructure issues remain which limit the growth potential of local businesses. These include local electricity supplies and mobile phone coverage along with public transport links.

2.35 Businesses are struggling to recruit staff at all levels, but this is particularly acute in digital, technical, and hospitality roles. The high cost of housing and poor public transport links magnifies the problem, and this is also reflected in key-worker roles in health and education.

2.36 There is also the need to ensure local people can access training to acquire the skills needed in the local economy and to attract and retain young talent. The T Level developments and apprenticeship provision at Cirencester College provide an opportunity to improve this but skills development also relies upon employers providing placements or taking on apprentices.

PRESSURES ON NATURAL CAPITAL

2.37 The pressure of growth on the natural capital and environment of the town will impact on climate change mitigation, biodiversity decline and habitat fragmentation. It also threatens the green spaces that are valued by the community. Net carbon capture targets require retention and extension of trees and hedgerows combined with an active strategy for a reduction in vehicle emissions.

2.38 Biodiversity targets will require strategies that limit the removal of vegetation, meadows, verges, and private gardens, as well as protecting wildlife corridors. Extending the built environment also increases the pressure on land to absorb sudden and heavy rainfall resulting in the raised risk of floods, whilst reducing green buffers and recreational green spaces. Rising summer temperatures raise the need for extending, not decreasing urban shade and landscaping with better river management to maintain the water flow and quality of the River Churn and Daglingworth Stream.

2.39 This Plan supports the protection, extension and appropriate maintenance of the natural environment within the town. Whilst acknowledging that robust design and landscaping infrastructure for new housing developments, priority must also be given to non-sensitive land banks within Cirencester, reducing by design access to green spaces for vehicular access, movement and parking and providing greater natural landscape which increases biodiversity and reduces the risk of fragmentation of wild areas.

PROTECTING THOSE FACTORS THAT AFFECT HEALTH AND WELLBEING

2.40 Health and wellbeing, particularly mental health, was never more challenged than during the Covid-19 pandemic. During the first lockdown residents commented how much they valued the reduction in noise from reduced traffic and the quieter streets, access to nature and green spaces, social cohesion and the sense of community coupled with a growing appreciation of their local environment.

2.41 Retaining and extending the qualities of the town which residents value, that contribute to harmony, wellbeing, and a sense of social and collective responsibility will be protected by the policies within this Plan.

IMPROVING THE QUALITY OF THE PUBLIC REALM

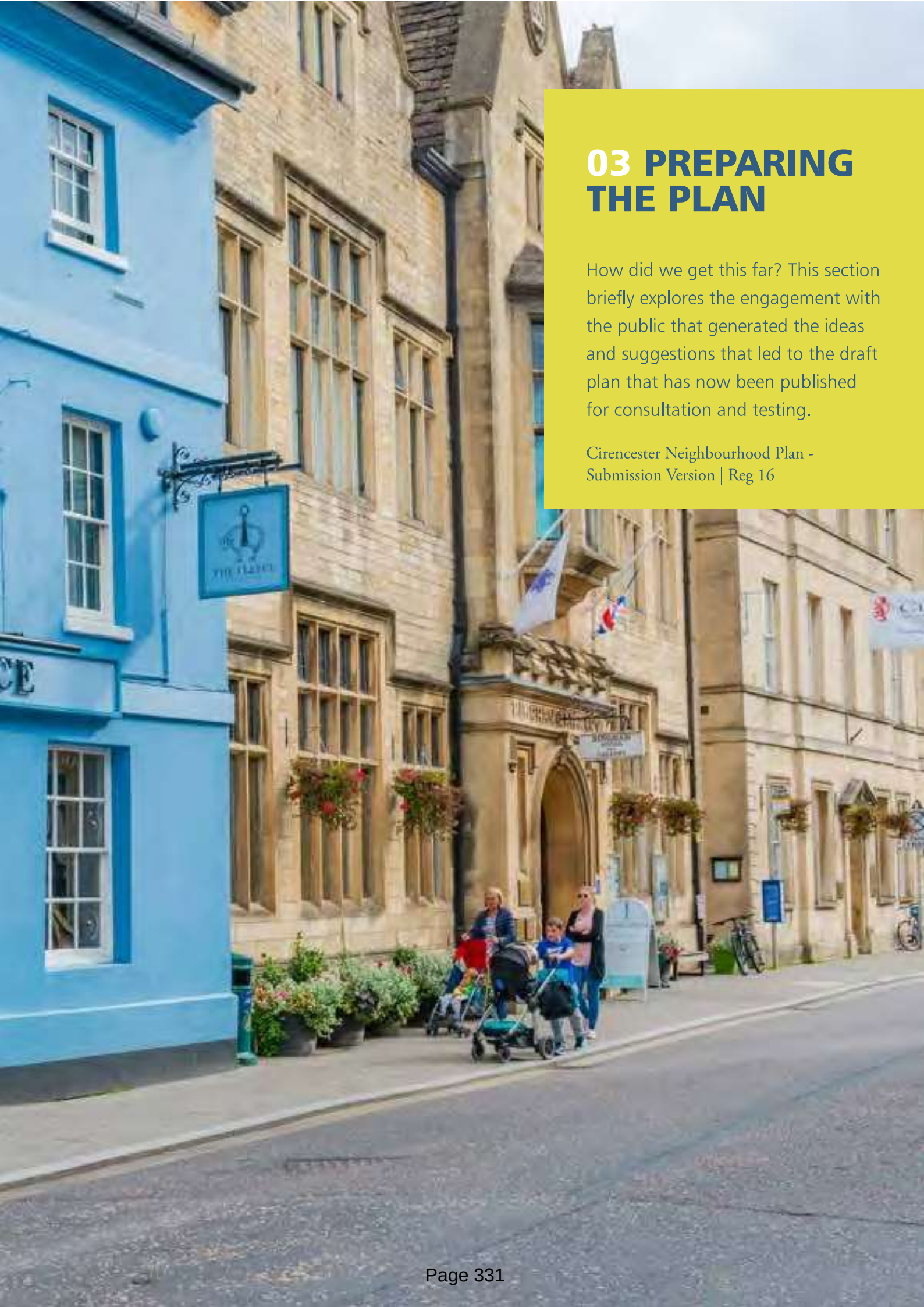
2.42 The creation and maintenance of a healthy public realm for Cirencester, the spaces between and around the buildings, is essential to the achievement of a thriving, vibrant, sustainable, and attractive town that everyone can enjoy and take pride in. As well as being able to move around easily, it is important that people feel the town is a safe and welcoming place. Public spaces and streets need to be versatile and provide for people from different cultural backgrounds, age groups, genders, the disabled and elderly, all of whom will use our town spaces in different ways.

2.43 Cirencester's character is as much defined by these spaces and the considerable heritage and architectural richness as its natural landscape, giving a sense of place and distinctiveness.

2.44 The town has been fortunate in the preservation of the streets which open onto the historic Market Place. Over the last few years a great deal has been achieved to improve the quality of the public realm, most notably the alteration of traffic flow, additional street furniture and greater pedestrianisation which has made possible the growth in the street markets and community events.

2.45 Outside this area, pedestrian experiences are hampered by poor maintenance of the surfaces, narrow historic roads sometimes, as with Park Street, lacking suitable modern pavements, confusing road use such as Cricklade Street and limited street furniture provision. Signage to and from the town centre could be improved, especially for tourists and visitors.

2.46 Connecting the public realm to surrounding open spaces can be achieved through creating and improving green corridors. The Town Council supports alocal community group of volunteers, the Phoenix Gardeners, who plant the town's tubs and beds, and this should be extended to include the planting of trees and other greenery.



03 PREPARING THE PLAN

How did we get this far? This section briefly explores the engagement with the public that generated the ideas and suggestions that led to the draft plan that has now been published for consultation and testing.

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03

PREPARING THE PLAN



3.1 On Tuesday 11th September 2018, Cirencester Town Council agreed arrangements for proceeding with the preparation of a Neighbourhood Plan including an application to Cotswold District Council (CDC) to designate the whole of the Cirencester parish as a neighbourhood area, see map on page 28.

3.2 The original purpose of preparing the Neighbourhood Plan was to add detail relevant to Cirencester, to Local Plan policies and propose new planning policy on issues that the Local Plan was silent on. A further requirement was the necessity to maintain the unique quality of the town's heritage and architecture while developing a plan that sought to mitigate the impact of climate change and improve health and wellbeing.

3.3 Cirencester is a relatively large settlement to be a designated neighbourhood area, and with a population of circa 20,000 people, undertaking full engagement with all demographics and organisations presented a significant challenge.

3.4 In the autumn of 2018, the Town Council established a Steering Group consisting of community volunteers, Town Councillors and ex-officio appointments including the Lead Member for Climate and Environment, officers and an elected representative from Cotswold District Council.

3.5 In March 2020, after time researching how to develop a Neighbourhood Plan and preparing an outline of its necessary contents, the Steering Group engaged widely within the community, including local groups and businesses, through its 'Have Your Say' consultation. This identified various issues which needed to be addressed.

3.6 Five thematic groups were established to research the issues facing Cirencester, these were:

- Access, Infrastructure and Transport
- Community, Culture and Leisure
- Development, Design and Built Environment
- Economy, Business, and Retail
- Environment and Climate Change

3.7 This research, carried out via Zoom during the first lockdown, created an excellent platform for subsequent phases of the project. It also highlighted the need for the appointment of a specialist Planning Consultant to lead and direct the work. In the Spring of 2021, the Steering Group through the Town Council engaged Feria Urbanism, an urban design and urban planning consultancy.

3.8 The Steering Group consulted the public again via a series of themed digital workshops run by Feria Urbanism, who also sought contributions from primary school pupils and held face-to-face workshops with Cirencester College students.

3.9 The results of the thematic work, digital workshops and student input were then pulled together in a Progress Report and published. Community feedback and comments were then collected during August and September 2021 via a series of pop-up stalls in the town centre and an on-line questionnaire.

3.10 In early December 2021, the Steering Group organised a three-day exhibition. This comprised display boards, interactive tasks, and a slideshow presentation, available online should any member of the public not be able to attend in person.

3.11 The next stage of the process was to prepare the Regulation 14 draft Neighbourhood Plan. With extensive research and public engagement, this was a complex process. To assist with reviewing the granular detail and start drafting policy, various sub-groups were established, including town centre



connections and non-designated heritage assets. At the initial stage, the Town Centre Connection Sub-Group worked closely with officers at Cotswold District Council and their consultants on the development of the Town Centre Master Plan. The final iteration of the masterplan, both in concept and detail and which is referenced in Chapter 5 of the Plan, falls within the remit and responsibility of Cotswold District Council.

3.12 In 2023, the Regulation 14 draft Neighbourhood Plan document was published for formal consideration and statutory consultation. The Steering Group signed-off the draft document with minor updates on 10th October, the document was then approved in principle on 17th October by the Town Council's Planning Committee, subject to various revisions being made.

3.13 On 14th November 2023, Cirencester Town Council formally approved the Vision, Aims and Objectives, and Planning Policies for statutory consultation.

3.14 The Reg 14 statutory consultation took place between the 1st February 2024 and 17th March 2024. In addition to using the online Commonplace citizen engagement platform, a three-day drop-in event was held at the Corinium Museum in Cirencester; this included illustrative display boards, paper copies of the Reg 14 document and questionnaire, and a presentation from Feria Urbanism, which was recorded and made available online.

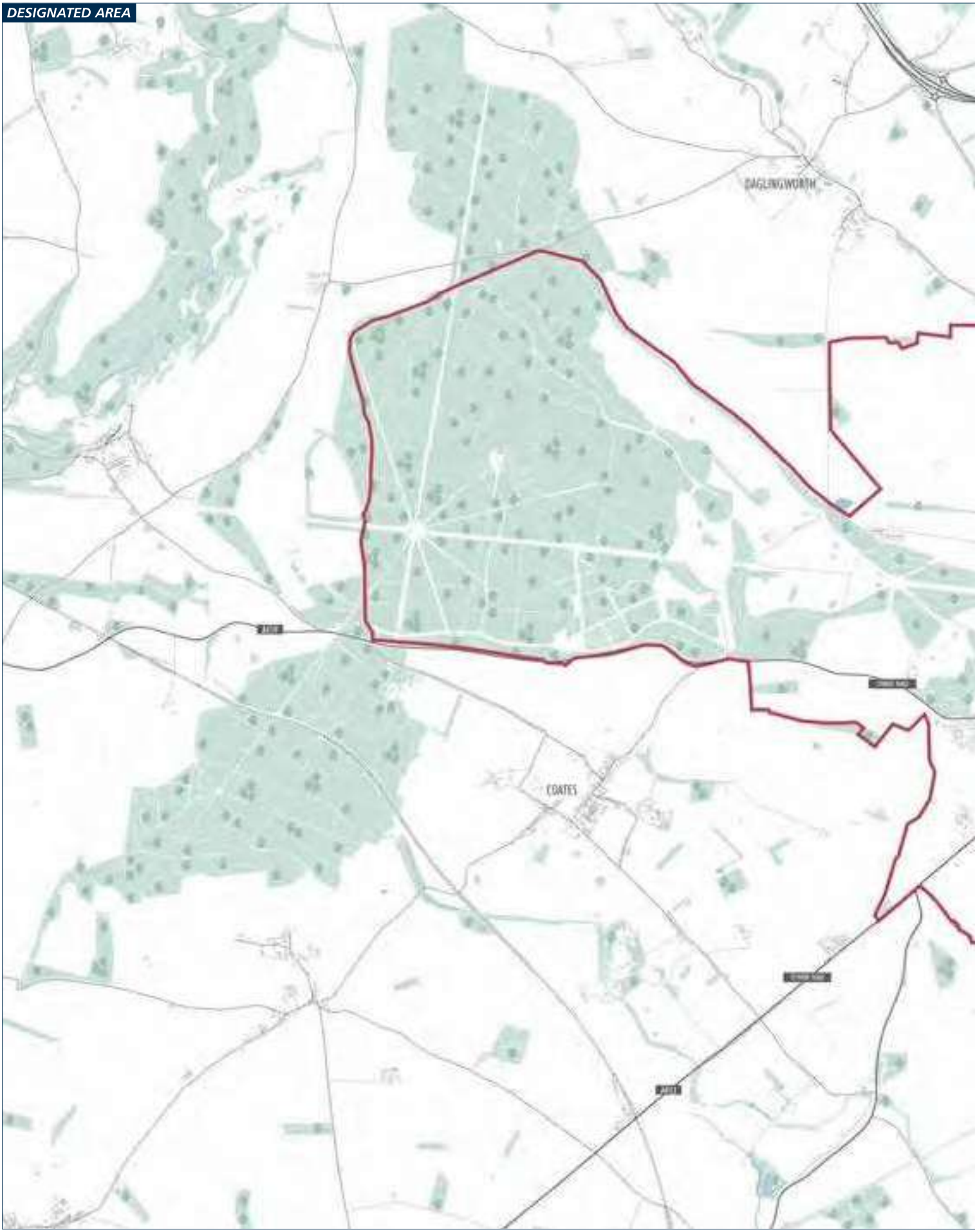
3.15 The feedback and comments from the public and statutory consultees were collated and presented to the Steering Group in May 2024 and further analysis undertaken.

3.16 In consultation with Feria Urbanism and the Steering Group the Reg 14 document was revised between August and October 2024 and the Reg 16 Neighbourhood Plan was drafted.

3.17 The Town Council's Planning Committee reviewed the policies and basic conditions statement on the 27th August 2024 and 22nd October 2024 respectively, with the Steering Group endorsing the final draft on the 7th of November 2024 for recommendation to Council.

3.18 The Town Council considered approval of the Reg 16 Neighbourhood Plan, including the list of non-strategic projects in Appendix 1, for formal submission to Cotswold District Council on the 12th November 2024.

3.19 A detailed evidence base of consultation and engagement throughout the process of preparing the Neighbourhood Plan, including the response to the statutory consultation is included within the Consultation Statement.


DESIGNATED AREA
DAGLINGWORTH
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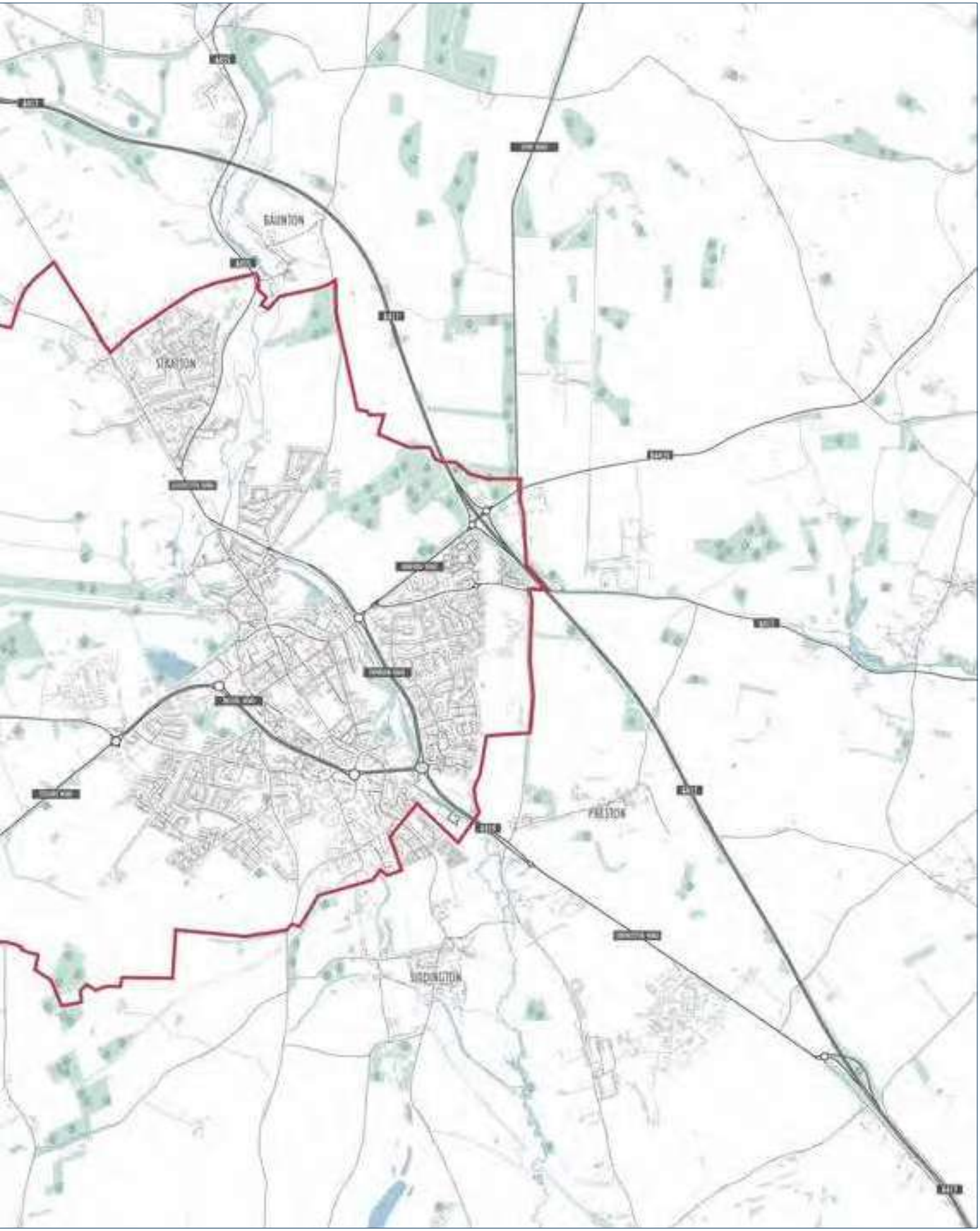
BAUNTON
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PRESTON

04 AIMS & OBJECTIVES

What does the Cirencester Neighbourhood Plan seek to achieve? This section sets out the outcomes that are expected as a result of the various planning policies coming into effect if the plan becomes the statutory planning document that guides development across the town.

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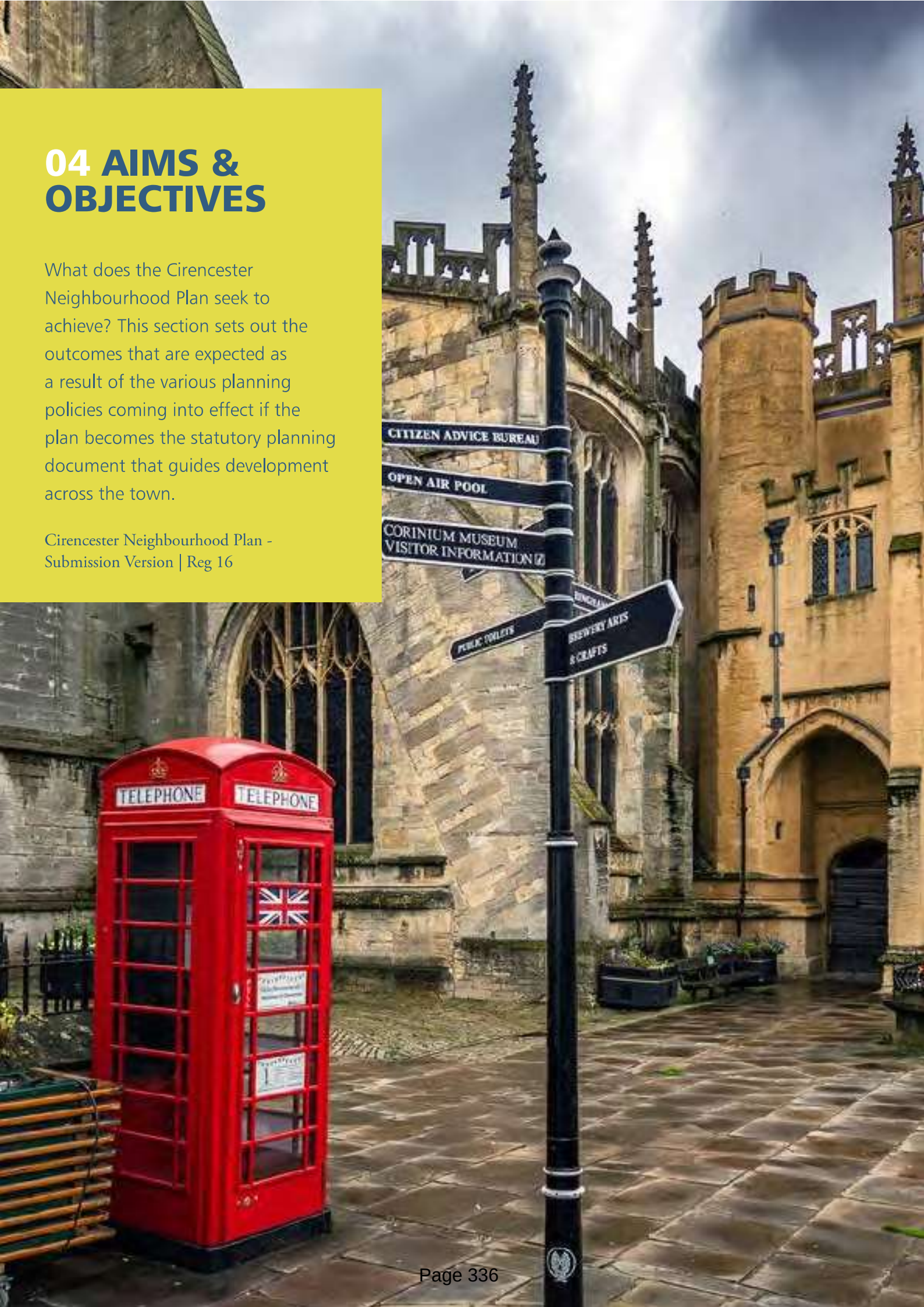

04

AIMS AND OBJECTIVES

The Neighbourhood Plan is directed by the following set of aims and objectives:

4.1 Ensure that land made available for new development better facilitates and maintains a vibrant, connected, economically active and sustainable town centre without adding to congestion or flood-risk. [Policies TC1, AM1, QPR2, TMN1, LE1, LE2 and Chapter 10 Natural Environment refer]

4.2 Create a convenient, robust, and flexible network of streets and spaces that promote all modes of active travel leading to reduced reliance on private vehicles. To support this, there is a need for enhanced public transport, an Integrated Mobility Hub and increasing safe pedestrian and cycle access within the town. [Policies TC1, AM1, AM2, AM3, AM4, AM6, QPR2, WBC2, WBC3 and TMN1 refer]

4.3 Improve connections of the outlying suburbs to the historic centre by footpaths, cycleways and public transport which are hindered by highway barriers and gaps in the walking and cycling routes. Overcome the highways barrier created by the A419 and A429 dual carriageways by putting in place direct, street level crossings for pedestrians and cyclists at each roundabout and subway. [Policies AM1, AM5, QPR4, NE3 and LE4 refer]

4.4 Put a '20 Minute Neighbourhood' model in place across the whole of Cirencester through the development of safe, sustainable, liveable, and mixed communities with active transport to jobs and essential services to meet the daily needs of the community. [Policy TMN1 refers]

4.5 Facilitate a reduction in carbon emissions and contribute to achieving the national goal of net zero. [Polices TC1, DBE1, DBE5, DBE6 and WBC1 refer]



4.6 Improve the sustainability of both conversion and new build development through use of low carbon materials, construction methods and facilitate low carbon running costs in accordance with the Cotswold Design Code. [Policies DBE2, DBE5, DBE6 and LE1 refer]

4.7 Prioritise new residential development towards affordable homes and first-time buyers and avoid age-specific residences. [Chapter 2, Chapter 5 and Policies DBE3 and DBE7 refer]

4.8 Minimise future flood risk by protecting and, where possible, extending the functional floodplain; requiring new developments to provide multifunctional mitigation measures, such as sustainable urban drainage systems, to ensure that rainwater is attenuated within the site and supporting solutions to improve the management of the river flow on the upper Churn to reduce flooding and drying up. Guidance on flooding and health from UK Health Security Agency refers. [Chapters 2, 10 and 12 refer]



4.9 Maintain, protect, and enhance the distinctive Cotswold-rich visual character, views and heritage of Cirencester, its immediate historic setting and vistas and its connections to the surrounding areas. [Policy DBE2, DBE4 refers]

4.10 Protect and enhance low carbon economic activity, to encourage the promotion of innovative and high-quality employment space. New employment premises to be part of both existing and new mixed-use neighbourhoods, moving away from employment zoning, subject to respect for the character, scale, and appearance of such areas. The retention of existing skills, and the development of new ones through youth apprenticeships and placement schemes through local business and Cirencester College. [Policies LE1 to LE4 refer]

4.11 Protect, maintain, and enhance the natural environment, including local green spaces, parks, trees and green buffers, habitats, the River Churn, Gumstool Brook and all wildlife corridors alongside their connection to the wider landscape, promoting biodiversity and planting native species. [Policies NE1 to NE5 refer]

4.12 Protect existing, and deliver new easily accessible, community infrastructure, including for primary health care, skills development, recreation, sport, leisure, and cultural enrichment, as well as education and academic provision, to fill existing gaps and support the future of Cirencester and its population growth. [Chapters 2 and 12 and Policies QPR3, TMN1 and LE3 refer]

4.13 Facilitate a reduction in noise and light pollution within the town and in new development whilst maintaining and improving air quality through a reduction in emissions. [Policies QPR1, WBC1, WBC6 and WBC7 refer]

4.14 Protect and improve public safety and the perception of feeling safe through urban design that increases the opportunity for community vigilance and design out crime. [Policy WBC5 refers]



05
CIRENCESTER TOWN CENTRE AND AREAS OF DISTINCTIVE CHARACTER

The heart of the neighbourhood plan area is the town centre and draft planning policies have been established to deliver changes to the town centre. This section also includes 25 principles to guide the redevelopment of the town centre, categorised under five themes of townscape and heritage, connections and permeability, contemporary sense of place, "green to the core", and flexibility and multi-functionality.

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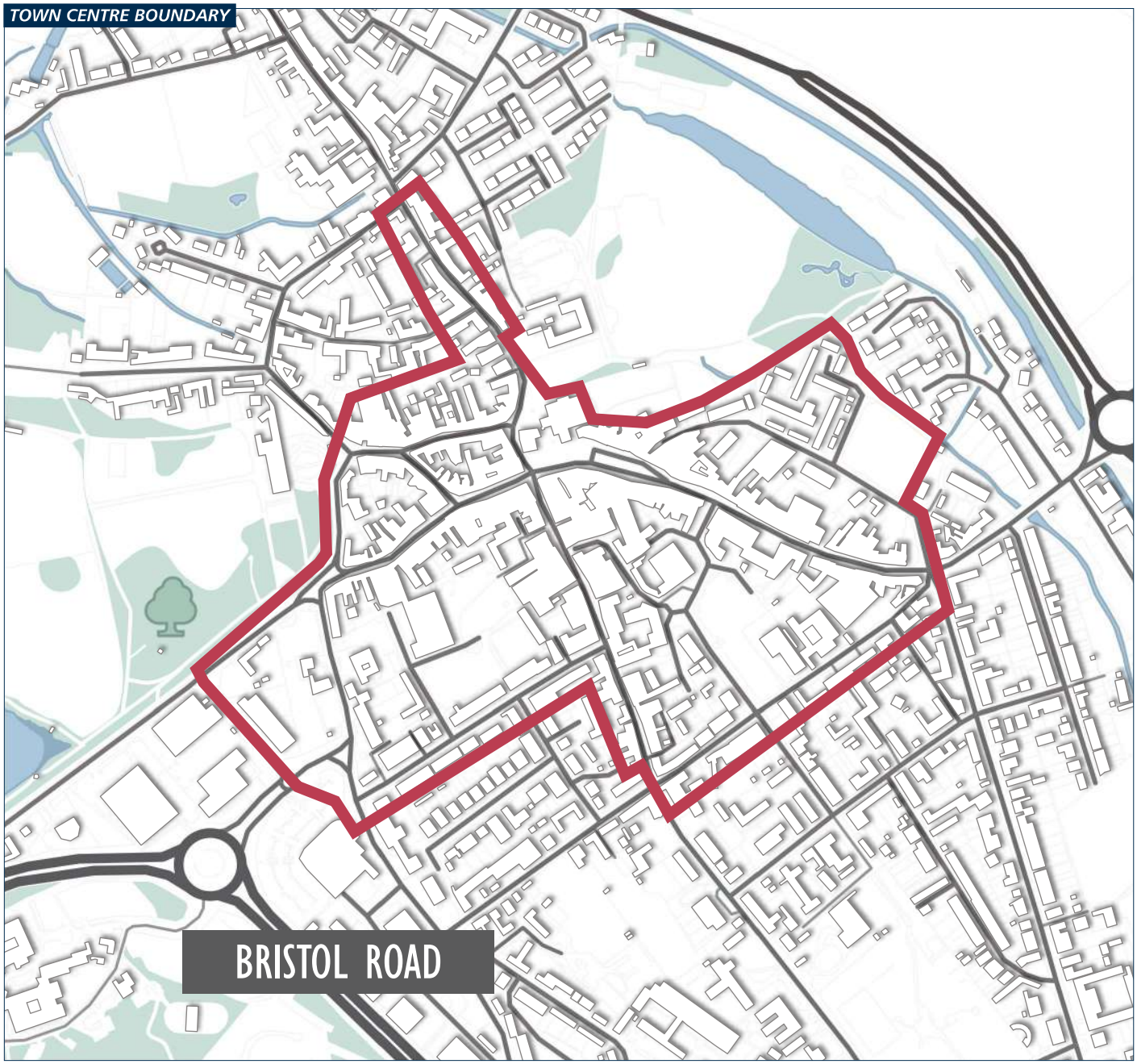
POLICY TC1 – TOWN CENTRE AND AREAS OF DISTINCTIVE CHARACTER

Development proposals within the defined town centre area (Cotswold District Council Local Plan and Town Centre Master Plan refer) that are in accordance with the design and development principles described by the Neighbourhood Plan will be supported.

Development proposals which fall outside of the town centre area, but are within the boundary of an Area of Distinctive Character that are in accordance with the design and development principles described by the Neighbourhood Plan will be supported.



5.1 A prosperous market town, Cirencester is the district's main settlement and is celebrated as the 'Capital of the Cotswolds'. The town is the service centre for a wide catchment of Cotswold residents and a significant tourist destination.

5.2 The town centre as defined within the Local Plan and the areas of distinctive character as identified within the Neighbourhood Plan are surrounded by swathes of green space, with the beautiful Abbey Grounds to the east, Cirencester Park to the west and the Amphitheatre to the southwest, with visual and vista qualities that are highly regarded.

5.3 Unlike many town centres, Cirencester has not been significantly affected by the impact of online shopping on high street retailing. But in common with other towns, it has experienced a loss of national multiples (including town centre convenience retailing). For example, despite Cricklade Street being highly accessible, it has seen a decline over recent years.

5.4 Section 7.4 of the adopted Cotswold District Local Plan 2011- 2031 identifies the key aim for Cirencester town centre to provide an attractive and vibrant place where people can access a good range of local services and facilities, including a diverse retail offer. It sets out how the town centre can evolve and improve to ensure that it continues to compete effectively by continuing to offer a different experience to larger neighbouring centres.

5.5 Section 7.4.24 of the Local Plan recognises how, in the longer term, the town centre will deliver significant retail and business opportunities along with new homes. This would be guided by a town centre master plan produced by Cotswold District Council in association with many other stakeholders. The Master Plan will update and review the existing Supplementary Planning Document and build upon the principles that are essentially still valid and supported. It will seek to develop Cirencester town centre in a holistic manner, balancing the need to manage traffic, and improve the appearance of the public realm with other competing, environmental, social, and economic objectives.

5.6 The urban spaces comprise various car parks and these provide an opportunity for urban intensification to revitalise the area. The displaced car parking would be accommodated in new decked arrangements on the periphery, to the east and/or west of the town centre.

5.7 These new decked car parks would be easily accessible from the strategic travel routes to the west and east of the town. The buildings would be greened, with green walls to provide biodiversity, urban cooling, and aesthetic benefits. Rather than car parking, the rooftops of both buildings could be set aside for outdoor civic spaces (e.g. sculpture park, performance space, viewing platforms etc.) overlooking the town.

5.8 As part of the overall redevelopment of existing car parks, an Integrated Mobility Hub can be accommodated. The delivery of an Integrated Mobility Hub is supported by Policy AM 4 of the Neighbourhood Plan. Cotswold District Council's Cirencester Area Public Transport Study, January 2023, has identified either the Forum Car Park or The Brewery Car Park as viable sites. Early Neighbourhood Plan consultations and the regulation 14 consultation in 2024 identified the Old Station as a preferred location.

5.9 The rationalisation of car parking and delivery of an Integrated Mobility Hub provides an opportunity to use land in the town centre more productively. Through careful design interventions to spaces, access routes and buildings, a better-defined series of urban blocks can be delivered here. This land will be redefined, seeking to curate a mix of retail, cultural, leisure and entertainment uses to ground floors, as well as increased residential development to enhance footfall in the town centre.

5.10 An array of pedestrian routes could enhance the street network and permeability from these sites to the town centre, bringing people in from the east and west. A series of urban pocket parks or themed spaces could be provided to bring greening to this part of the town, giving people a shady spot to escape to and relax in. To the south, provides an opportunity for three new unique gateway spaces to signify an entrance to the new urban space.

5.11 This should enhance urban vitality and viability, making Cirencester town centre a more pleasant space to spend time.

5.12 To assist with the implementation of Policy TC1, the seven areas of distinctive character are identified, see map on page 38 and defined, as follows:

5.12.1 NORTHERN QUARTER: The northern half of the town centre, north of Market Place and Castle Street retains a strong medieval character and established streets with positive urban grain and built form. There are minimal opportunities for redevelopment and any proposals coming forward for this area should be sensitive to the character of neighbouring built form and spatial quality and ensuring the enhancement of the predominant land use of the street, whilst maximising the upper level residential or small-scale office opportunities.

5.12.2 OLD STATION: This area needs to deliver a positive sense of arrival from both Tetbury Road and Hammond Way alongside highways alterations and public realm improvements to benefit active travel and public transport modes. It should include the positive integration of the listed railway station building as a community asset and careful consideration of the connection to the Sheep Street site. Furthermore, there must be consideration of the provision of a new urban arrival space (or western gateway) into the town from Hammond Way, alongside potential reconfiguration of the Waitrose car park. Consultation responses supported the Old Station as a site for the integrated mobility hub.

5.12.3 SHEEP STREET: The Sheep Street area is part of a connected series of places including the Old Station and Brewery. It is therefore an important transition space between them but also forms part of the arrival sequence from the western gateway to the town centre. There must be a connecting street from Sheep Street through to Cripps Road and proposals must also integrate the former air raid shelter into a well-defined spatial strategy, being careful to create frontages to all public streets and spaces.

5.12.4 THE BREWERY: The Brewery is a key site in the regeneration of the town centre. It should be designed to connect and integrate with Brewery Court and Bishops Walk to the east, Cripps Road and Sheep Street to the west and accommodate a frontage onto the public route to Ashcroft Gardens to the south. These routes should be designed as streets and public spaces that continue the unique character of the north of the town centre with tight streets, covered gunnels and fronted urban spaces with pedestrian priority but also accommodating a landscape strategy that delivers street trees together with SuDS (sustainable drainage system) to address the urban heat island effect and ecological emergency. The Brewery Car Park is an option for the Integrated Mobility Hub.

5.12.5 THE FORUM: The Forum needs to accommodate several interests, including altered access strategy, improved connectivity to Dyer Street and clearer and more positive urban grain and spatial arrangement for the area. The Forum is an option for the Integrated Mobility Hub.

5.12.6 THE WATERLOO: The Waterloo accommodates sites from Dyer Street through to the River Churn. Therefore, the key feature is the public cycle connection through from the river to Dyer Street and beyond. Development around the Argos block needs to ensure a fronted lane or street to both sides to ensure overlooking, safety and security of access is achieved. Additionally, the connection to Dyer Street and onwards to The Forum should be carefully considered to include potential future re-modelling into a more appropriate urban space. The Waterloo car park site should deliver a public frontage to the riverside with an urban parkland character and a clear route to the Argos site and beyond also fronting onto The Waterloo.

5.12.7 PHOENIX WAY: This area has the potential to deliver the regeneration of the town centre through its strategic location as a car park capturing movements from the A429 and as a connector from the town centre to the Roman Amphitheatre. A key feature is therefore the delivery, alongside public investment, of a pedestrian/ cycle ramp from Querns Lane to the Amphitheatre. Consideration must be given to the form of development by accommodating not only a positive space at the Sheep Street and Querns Lane junction but also in a built form, interpretation of the Roman Wall and urban grain. Furthermore, to maximise the value of the gateway at Hammond Way, there must be engagement with Waitrose to enable a conversation around accommodating its car parking on site.

5.13 There are 25 principles that guide the redevelopment of the town centre and areas of distinctive character, which are categorised under 5 themes, townscape and heritage, connections and permeability, contemporary sense of place, green to the core, and flexibility and multi-functionality. These principles should be read in conjunction with Cirencester

Town Council's, 'Cirencester Town Centre Public Realm Design Code', May 2017 and Cotswold District Council's 'Cotswold Design Code', incorporated within the Local Plan, August 2018 and other policies within this Plan due to the holistic and interrelated nature of the Plan.

TOWNSCAPE & HERITAGE

Principle 1.
New development should support a place that reflects, reveals, and celebrates layers of history.

Principle 2.
Street sections and block sizes should reflect and reinforce existing medieval hierarchy found elsewhere in the town.

Principle 3.
Application of these street sections to the opportunity sites will ensure an appropriate response to the Cirencester context.

Principle 4.
Narrow street sections will provide shade as part of a response to climate change and ensure a resilient town.

Principle 5.
Proposals should bring out the different characters of the centre, revealing hidden or obscured character areas and enhance views to key buildings and landmarks.

CONNECTIONS & PERMEABILITY

Principle 6.
Any new network of streets and spaces should be prioritised for pedestrians and be connected, comfortable, convenient, convivial, and conspicuous.

Principle 7.
Streets should be places to explore which are delightful, playful, shaded, beautiful and social.

Principle 8.
New development should enhance permeability and connectivity within the centre and to the wider town including the Amphitheatre.

Principle 9.
New development should connect seamlessly with existing and neighbouring buildings, streets, and spaces to enhance character of the place.

Principle 10.
Off-street public vehicle parking at edge-of-centre or out-of-centre locations should be provided.

Principle 11.
New or enhanced pedestrian and cycle routes to and through the town centre, activated through a series of new spaces to form a new animated route, encouraging active travel should be provided.

Principle 12.
The arrival experience, building upon and enhancing the town's historic arrival points should be provided.

CONTEMPORARY SENSE OF PLACE

Principle 13.
Layout and design should be of an exceptional quality and embody the highest standards in building and landscape architecture.

Principle 14.
Proposals should show a deep understanding of the defining characteristics of Cirencester and demonstrate how these qualities are expressed within the new urban form.

Principle 15.
New development should respect the historic environment while purposely raising its profile and presence as an important aspect of the town centre's identity.

Principle 16.
New development should be a contemporary interpretation of Cirencester's character, materiality and built form rather than pastiche representation.

Principle 17.
New development should enable modal shift in transport and movement around the centre, and to the rest of the town including provision of an Integrated Mobility Hub, discouraging dominance of motor vehicles.

GREEN TO THE CORE

Principle 18.
Development should enable greater access to green infrastructure (inclusive of water courses), as defined by the Building with Nature Standards, minimising hard-standing surfaces and enhancing soakaway.

Principle 19.
Category A and B trees, as defined by British Standard 5837:2012, should be retained with an expansion of green open space around trees to create intimate spaces which align with the preferred scale of streets.

Principle 20.
Proposals should aspire to net zero carbon, to use renewable energy, and deliver biodiversity net gain.

Principle 21.
Proposals should embed sustainable construction principles and encourage innovative methods of construction.

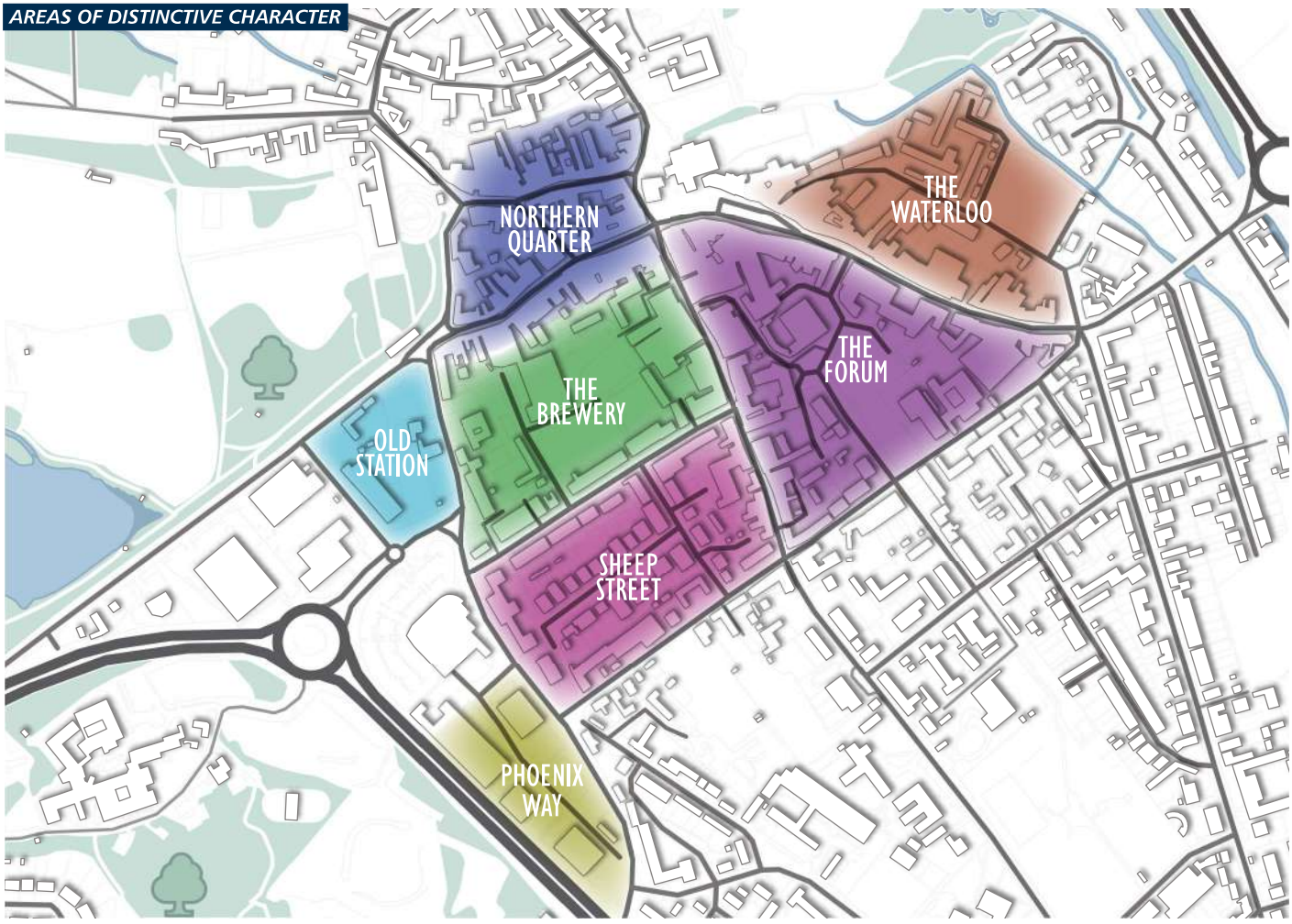
Principle 22.
New development should use materials, land, energy, and water efficiently and be designed for longevity, minimising pollution.

FLEXIBILITY & MULTI-FUNCTIONALITY

Principle 23.
Building blocks should be flexible and allow a mix of uses (e.g. shape, depth, height, and general arrangement) to allow the appropriate increase in commercial, retail, education, leisure, housing, transport, and parking assets in response to changing economic models.

Principle 24.
The flexible design of buildings should enable changes of use and retrofitting without substantial alteration.

Principle 25.
A retrofit, first approach, should be taken with existing buildings.





06 ACCESS & MOVEMENT

How people move around and across the town has a big impact on the quality of the town centre experience. The policies in this section aim to improve movement connections and overcome barriers in and around Cirencester making it safer, healthier, more sustainable, supporting the economic viability and vibrancy of the historic centre, and meeting the needs of all in a growing town.

Cirencester Neighbourhood Plan - Submission Version | Reg 16

POLICY AM 1 – THE CIRENCESTER SPOKE & WHEEL CYCLE AND FOOTPATH NETWORK

Support will be given for the creation of a cycle and footpath network radiating from the town centre to the residential neighbourhoods (the spokes) and connecting residential neighbourhoods to each other (the wheel).

Development which incorporates or contributes in proportion to its scale, proposals outlined within the Cirencester Local Cycling and Walking Infrastructure Plan (LCWIP), will be supported.

Development which creates or enhances street design, with good connections to and between local neighbourhoods will be supported.

Measures designed to help overcome the barriers created by the A419 and A429 dual carriageways including the provision of safe, direct, street level, (at-grade) crossings will be supported.

Development proposals which make cycle and footpath routes more welcoming, attractive and biodiversity-rich, that encourage usage and deliver on their potential to increase biodiversity connectivity will be supported.

POLICY AM 2 – TOWN & COUNTRY CONNECTIONS

The building of walking and cycling routes and other measures, that connect Cirencester with outlying areas, as proposed by the LCWIP, will be supported.

The delivery of the walking and cycling routes listed in Table 1 and projects which deliver the outcomes of the Connecting Places Strategy CPS4 South Cotswold (Gloucestershire County Council Local Transport Plan) will be supported.

POLICY AM 3 – THE PEDESTRIAN EXPERIENCE

Development proposals which bring forward measures to enhance the pedestrian experience will be supported.

These measures include:

a) widening footways and improving surfaces;

b) enhanced street design including high quality surfaces, street furniture, tree planting and other greening initiatives;

c) town centre management, including curation of events and festivals;

d) new signage and a wayfinding strategy;

e) rationalising and management of vehicle parking;

f) creating 'bumping spaces' for people to stop and meet;

g) moving all day and long-stay parking towards the periphery from the centre of the town;

h) implementing changes to operation of street network to remove unnecessary through traffic and increase safe pedestrian and cycle access within the town;

i) decluttering and removal of obstacles;

j) new residential areas being designed to minimise traffic speed at or below 20mph.

POLICY AM4 – INTEGRATED MOBILITY HUB

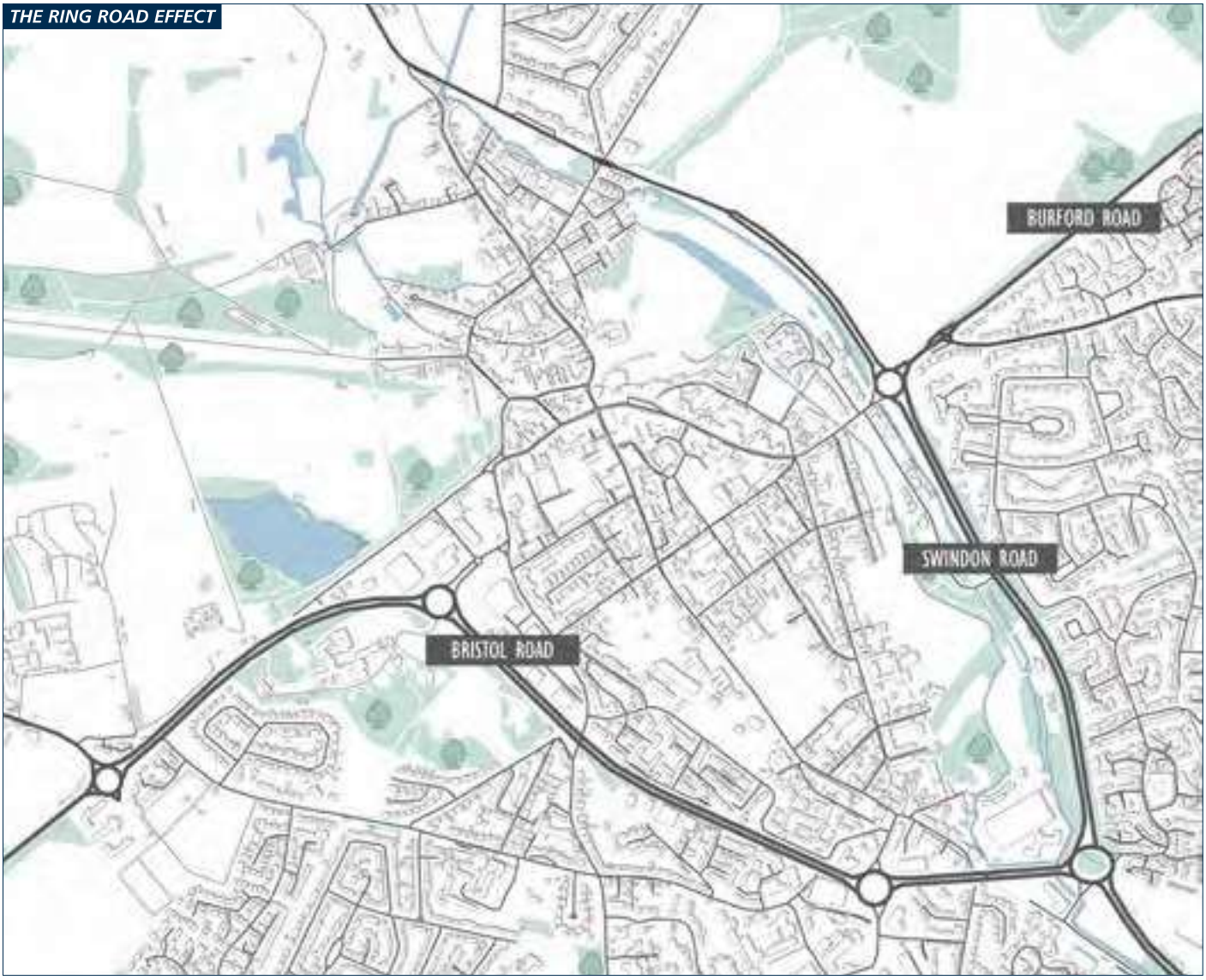
Support will be given for the development of an integrated mobility hub that includes ease of access to, and accommodation of:

a) local buses;

b) regional and national coaches;

c) very light rail, including other emerging transport modes;

d) taxis;



e) car hire/community car club;

f) cycle and e-bike hire;

g) cycle racks/shelters and repair stations;

h) passenger drop-off and pick-up;

i) demand responsive transport.

Proposals for an integrated mobility hub will be supported where viability principles outlined within this Plan have been taken into consideration.

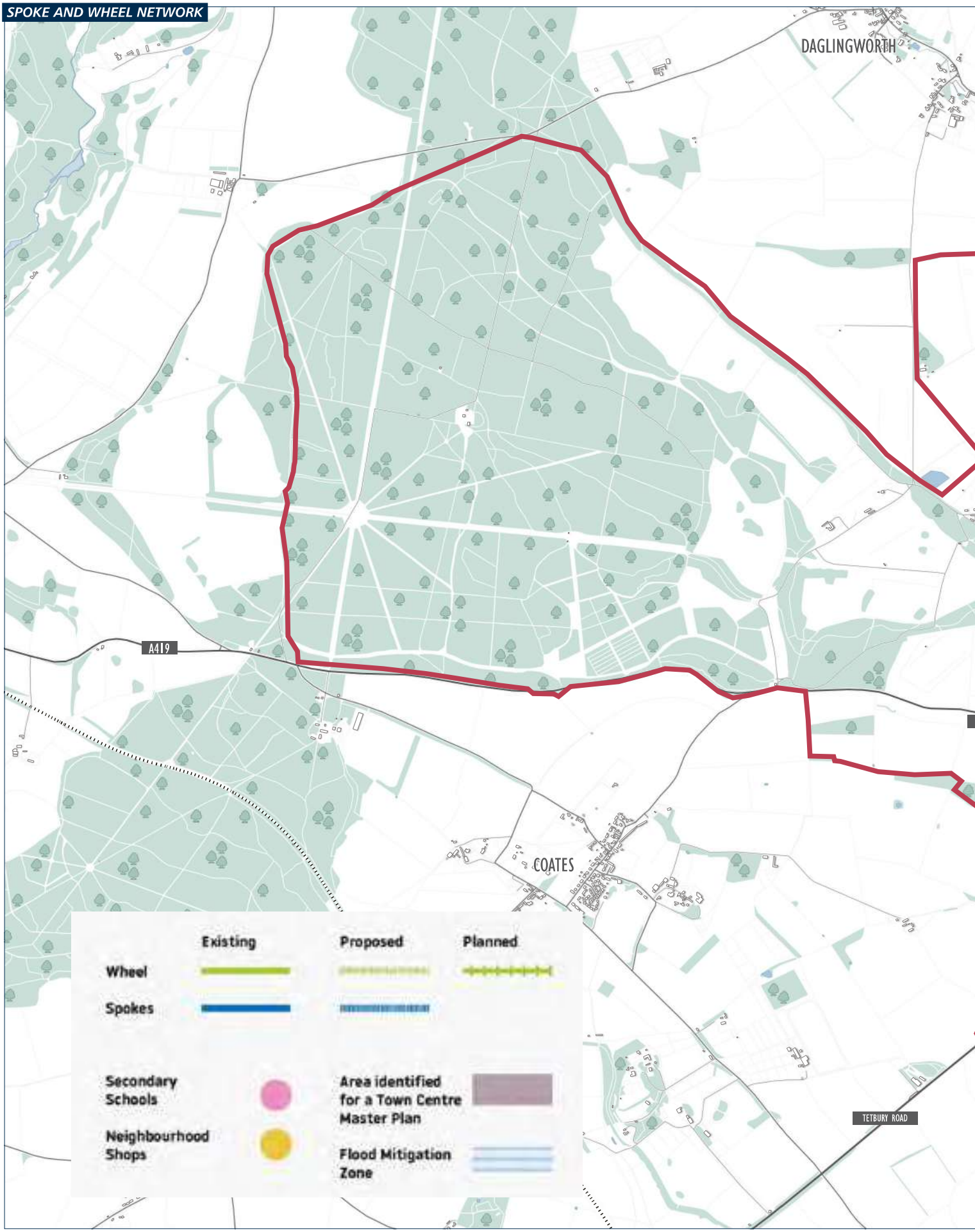
POLICY AM5 – STRATEGIC CONNECTIONS & TRANSPORT LINKS

Development which creates or enhances public transport links to Kemble will be supported.

Development which creates or enhances public transport links to places which are socially and economically important to Cirencester will be supported.

POLICY AM6 – SUSTAINABLE AND ACTIVE TRAVEL

Development which offers a genuine choice of sustainable and active travel options will be supported in accordance with the travel hierarchy, both within the development and beyond its boundary, as it connects with its surroundings.


SPOKE AND WHEEL NETWORK
DAGLINGWORTH
A419
COATES
TETBURY ROAD
Existing
Proposed
Planned
Wheel
Spokes
Secondary Schools
Neighbourhood Shops
Area identified for a Town Centre Master Plan
Flood Mitigation Zone

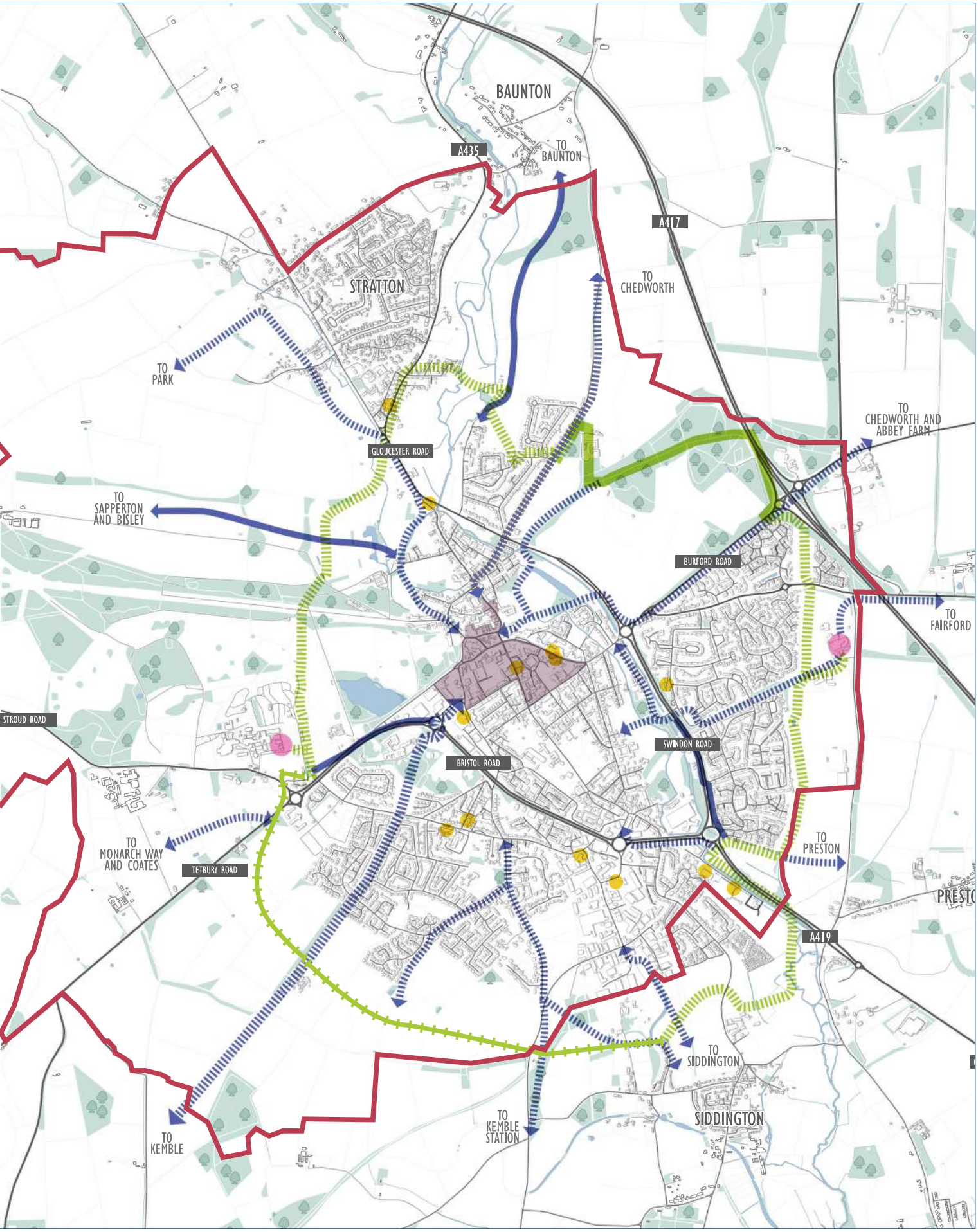

BAUNTON
A435
TO BAUNTON
A417
STRATTON
TO CHEDWORTH
TO PARK
TO CHEDWORTH AND ABBEY FARM
GLOUCESTER ROAD
TO SAPPERTON AND BISLEY
BURFORD ROAD
TO FAIRFORD
STROUD ROAD
SWINDON ROAD
BRISTOL ROAD
TO MONARCH WAY AND COATES
TETBURY ROAD
TO PRESTON
A419
TO SIDDINGTON
TO KEMBLE STATION
SIDDINGTON
TO KEMBLE

Table 1 – Proposed Connections between Town & Countryside

Connection	Description
Connectivity to Kemble Station	The route investigated and identified by the Cirencester Community Railway Project included cycling and walking options alongside a Very Light Rail line as an alternative route to that identified by SUSTRANS and the LCWIP. Furthermore, good, safe, at-grade connections to Kemble, its rail station and connection to the national rail network are strategically important for Cirencester to maintain and improve its national visibility and accessibility. Today, this station is not fully utilised because of a poor bus service connection and no safe at-grade cycle routes. Improved connections need to be established through the week including early morning and late evening and weekends.
Cotswold Water Park & South Cerney	Sustrans Route 45 towards South Cerney and the Cotswold Lakes is difficult to access because of the ring road and Love Lane Industrial Estate. Creating safe cycling and walking links between the Cotswold Lakes and Cirencester is important for local recreation and tourism between the two locations. It would also link the two major industrial areas at Love Lane and Broadway Lane. This project is also a priority for the Cotswold Lakes. There are opportunities to re-use industrial heritage such as the remains of the Cirencester branch of the Thames Severn Canal or old railway lines. A path from Tesco to Siddington Church possibly via the field behind the petrol garage which has been offered by the owner for flood alleviation. This would link to the 'wheel' in AM1. C.f. Paragraph 2.4.2 of the South Cerney Neighbourhood Plan and Policy SC15 Sustainable Travel and Rights of Way Network: "Redevelopment of a new off-road cycle link towards Cirencester and a cycle path to the Duke of Gloucester Barracks and the Cotswold Water Park".
North up the Churn	The route northwards alongside the Churn is currently blocked by landowners north of North Cerney. The old railway line to Chedworth is currently inaccessible. Additional riverine footpaths along the Churn to be opened up to join existing rights of way into a long-distance footpath.
West via the Old Bisley Road	Cycle and footpath west of Cirencester along the Old Bisley Road towards the Frome Valley and Stroud. This route includes restricted pathways through the Bathurst Estate. The ancient right of way along the Old Bisley Road was closed by the landowner in the 19th century.
East to Fairford and the Eastern Cotswold Water Park	There is no long-distance footpath to the east beyond Preston which is a barrier to recreational cycling and tourism between Cirencester and the eastern part of the Cotswold Water Park.
Monarch's Way	Access to the Monarch's Way long-distance footpath is via the RAU land but there is no safe crossing of the A419 Stroud Road and the narrow, poorly maintained footpath alongside the Tetbury Road is particularly dangerous. The proposed development of the Innovation Village at the RAU intends to improve access and amend the route so it goes through the development. North to Chedworth via Old Railway Line The railway line exists for most of the way but is now privately owned. It is possible to reach Chedworth by road, but roads are not safe for cycling, especially for young or inexperienced riders.

6.1 These policies aim to improve access and movement connections and overcome barriers in and around Cirencester making it safer, healthier, and more sustainable, in support of the 20 minute neighbourhood policy (TMN1) and wider economic viability and vibrancy of the historic centre, whilst meeting the needs of all in a growing town. While improving transport connections and options outside of the town are beyond the remit of this document, the Neighbourhood Plan supports such issues being addressed and resolved on behalf of Cirencester with transport operators, at a County Council, regional, and national level.

6.2 Both the National Planning Policy Framework (NPPF) and Cotswold Local Plan require consideration of transport at the early stages of proposed development with far greater emphasis to improving health, reducing congestion and air pollution, and promoting sustainable travel. Priority should be given (paragraphs 112 NPPF 11.2.6 CLP refer) to provision for walking and cycling and for high quality public transport.

6.3 This Neighbourhood Plan supports the proposed 33 cycling routes and 23 walking routes as identified by Gloucestershire County Council in July 2022 within the published Local Cycling and Walking Infrastructure Plan (LCWIP).

6.4 An attractive built environment has been shown to encourage walking, cycling and other healthy behaviours. A high-quality public realm and a sense of place can incentivise active travel and create a sense of community cohesion by reducing social isolation and the fear of crime. Suitable access allows everyone to participate equally and improves overall health and wellbeing.

6.5 It is important that the needs of Cirencester are given greater attention in Gloucestershire County Council's transport strategies, with the purpose of improving connectivity of walking and cycling routes, increasing options for moving around the town, overcoming barriers, and improving public transport.

6.6 There is also a need for greater engagement with transport and local bus operators, as well as Cirencester College and the Cotswold Lakes Trust to obtain the right level of investment in transport links with Cirencester and address transport issues identified in this Plan.

6.7 Cotswold District Council's Local Plan requires the facilitation of access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services and appropriate facilities that encourage public transport use. To attract more fee-paying customers onto buses and coaches they need to provide rapid point to point transport which means avoiding delays in the town centre. Increasing numbers is essential to persuading operators to add routes in the evenings, weekends, and to other locations such as Bristol, Oxford, or the Midlands.

6.8 Changes which are supported to improve connectivity and access include:

6.8.1 Rebalancing travel within the Plan area and connecting schools and residential areas to the centre and to each other. Measures are required to support safe and active travel by walking and cycling. This includes implementing the LCWIP and aspirational 'spoke and wheel' projects identified by the community as being:

6.8.1.1 creation of a new walking and cycling link from rear of Tesco to The Steadings roundabout on Spratsgate Lane, via Siddington Church and Orchard Fields. This route will then connect into the new cycling and walking infrastructure within The Steadings neighbourhood and on to the Royal Agricultural University;

6.8.1.2 upgrade of the existing permissive footpath between Harebushes and Bowling Green Lane to accommodate cycling journeys;

6.8.1.3 upgrade of the existing footpath between Bowling Green Lane and Whiteway View to accommodate cycling journeys;

6.8.1.4 completion of a new route connecting Chesterton and the Steadings, (via existing LCWIP route 19) past the Amphitheatre and across the dual carriageway to Phoenix Way;

6.8.1.5 completion of a circular perimeter route around the entire urban perimeter of Cirencester in particular to the north and east from Hare Bushes to

Kingshill Country Park, with the aim of improving restricted access across Cirencester Park;

6.8.1.6 completion of an inner loop based on the Hare Festival way;

6.8.1.7 a cycleway and children's scooter lane to be created from Somerford Road to the Apsley Road, Chesterton Primary School entrance, along/adjacent to existing footpath.

6.8.2 Making appropriate connections to existing footpaths, cycleways, rights of way and bridleways to provide safe walking and cycling routes to the countryside and neighbouring settlements.

6.8.3 Promoting and extending public transport use; the town needs a movement hub and a strategy to increase services within the town and to other destinations.

6.8.4 Removal of unnecessary vehicular traffic from the town centre, reducing congestion and improving air quality, improving access for pedestrians and cyclists, and protecting the built heritage of the town.

6.9 The Neighbourhood Plan supports Cirencester Town Council, Cotswold District Council and Gloucestershire County Council in actively seeking funding for the routes listed in Table 1 from, among other things, contributions from new development, requiring developers to make provision for these routes in their proposal, and regional and national funds available for increased active travel.

6.10 At present, Cirencester has no single hub for public transport services. The majority of bus services use the bus stop opposite the Forum Car Park, with a limited number of services using the stop across the road, further south from the town centre.

6.11 As well as causing difficulties for cars accessing the Forum Car Park when multiple buses arrive at the same time, these stops are not intuitively located for newcomers to Cirencester looking to find their way to the heart of the town centre.

6.12 Other important services do not serve the Forum bus stops, including the National Express coach service between London, Gloucester and Cheltenham which uses the bus stop near the Beeches Car Park and the busiest bus route serving the town, Route 51, uses the stop outside Bingham House in Dyer Street.

6.13 There is limited bus stop infrastructure, and a lack of customer information provided at the existing town centre bus stops other than a real-time information departure board at the stop opposite the Forum Car Park.

6.14 There is no drop-off facility for tourist coaches that visit Cirencester, resulting in a number of informal locations across the town centre being used, varying in appropriateness and safety. Community transport (dial-a-ride style) services also drop off at various informal points without dedicated infrastructure around the town.

6.15 The one-way system through the town centre, combined with various narrow streets and sharp turns, restricts access for bus journeys. This can result in circuitous journeys, or in the case of several services to and from Cirencester College, the town centre not being served at all by buses.

6.16 An Integrated Mobility Hub for Cirencester, would provide a single focal point for access to the town. This would increase the appeal of using bus services as well as allowing key facilities such as tourist information to be consolidated in a single focal point. To be effective any site will need to be in close proximity to the heart of the town and easily accessible.

6.17 The hub would provide a gateway to the town for unfamiliar visitors and provide new users with a single point of access to travel and bus information, in turn providing greater confidence to use public transport for journeys to and from town. An integrated hub could also provide a single location for coach drop-off and pick-up.

6.18 The hub could be a simple yet eye-catching structure to provide shelter and transport information whilst not detracting from the urban realm and historic quality of the town.

6.19 The following principles should be considered when determining the viability of a location for the Integrated Mobility Hub:



6.19.1 TOWN CENTRE INTEGRATION: At the heart of the town centre, the Market Place is in the immediate vicinity of key shops and facilities and provides easy visual aids for navigating to most key locations in town. As such the transport hub should be easily accessible from here. This includes ease of access in terms of wide and safe walking space as well as easy wayfinding, ideally through natural means such as clear sightlines of landmarks, but also supported through signage and pavement design.

6.19.2 EASE OF ACCESS BY BUS SERVICES: Bus services accessing the hub should not have to take convoluted routes around the one-way system to get there. This will add to journey times, deter customers, and increase operating costs. A location that minimises the need for buses to cover additional distance to access it, will maximise the location's appeal to customers and bus operators.

6.19.3EASE OF ACCESS BY COACH SERVICES: National Express (and operators for services through Cirencester) have expressed a strong desire to minimise the distance coaches have to travel away from the A417 dual carriageway, as this adds to journey times. It is for this reason their service between Stroud and London travels along Cirencester's ring road but does not make a stop at Cirencester. For an integrated hub to be viable, it is essential that coach services can access any location with as little journey time from the A417 as possible.

6.19.4 ABILITY TO ACCOMMODATE BUSES, COACHES, DEMAND RESPONSIVE AND COMMUNITY TRANSPORT VEHICLES: The site should be large enough to provide a sufficient number of bays for buses and coaches to use the hub at the same time, including drop-off and pick-up points for community transport vehicles, ranging from cars to mini-buses equipped with specialist accessibility features.

6.19.5 CUSTOMER FACILITIES: The hub should provide the space and facilities for customers to wait in safety, protected from the elements and with access to good quality facilities including real-time information and, if appropriate, commercial facilities such as a shop or café.

6.19.6 DRIVER FACILITIES: Bus drivers play a crucial role in providing mobility to all of society, yet often struggle to have access to the most basic of welfare facilities. By providing driver toilets and a rest area (including space for drivers to prepare their own food and drink) the hub can accommodate duty breaks. This not only provides much needed facilities but will also encourage bus operators to treat the site as an operational hub, making it easier to add more services to and from Cirencester.

6.20 The dual carriageway highway infrastructure which runs around the centre of the town creates significant barriers to walking and cycling, across, into and out of the town centre.

6.21 Overcoming the barriers created by the A429 and A419 dual carriageway by putting at-grade cycle and pedestrian crossings in place will be a key mechanism through which the ambitions of Neighbourhood Plan will be delivered.

6.22 The introduction of 30mph speed limits on the A429 and A419 in the approaches to the at-grade cycle and pedestrian crossings, and between the hospital and Cirencester College roundabout, will make the introduction of an at-grade crossing more likely, in turn supporting the walking and cycling ambitions of this Plan.

6.23 The following improvements are also supported:

6.23.1 A429 Tetbury Road at The Steadings. Main site access roundabout with a minimum 3.0m wide shared footways and cycleways on all approaches (except for the western side) and a toucan signal-controlled crossing for pedestrians and cyclists across the northern A429 Tetbury Road approach with dropped kerbs and tactile paving on all other approaches to the junction.

6.23.2 A429 Tetbury Road at The Steadings. Secondary site access with a minimum 3.0m shared footway cycleway on the eastern side and northern side of the site access, connecting to the facilities and the main site access. Footway and cycleway connections are also provided to the existing facilities on the other approaches to the junction with dropped kerbs and tactile paving.

6.23.3 The A419-A429 Tetbury Road junction including Chesterton Lane junction on the ring road and the Cirencester College, Deer Park School and Stroud Road junction including a toucan crossing on the A429 Tetbury Road to the south of the Junction. A minimum 3.0m footway cycleway on the east and west of the roundabout, and on the cut through to the subway.

6.23.4 A toucan crossing on A419 Stroud Road towards the access to Cirencester College and Deer Park School.

6.23.5 At the junction of Chesterton Lane, toucan crossings across Chesterton Lane and the A429. The existing subway will be retained at this location and incorporated into the junction improvement proposals.

6.23.6 At the A419 -A429 ring road, Hammond Way and Hospital Junction including the Waitrose Hammond Way a toucan crossing on the A429 approach with a minimum 3.0m shared footway cycleway to the north and south of the A429. The junction will also incorporate infrastructure to facilitate a toucan crossing to the Amphitheatre to allow future aspirations of Cirencester Town Council to provide better connectivity between the Amphitheatre and town centre.

6.23.7 At the Waitrose access, a pedestrian crossing facility on all approaches except Hammond Way north.

6.23.8 At the A419-A429 ring road, Midland Road, Watermoor Way and Fire Station roundabout including Midland Road, a pedestrian crossing across the Bristol Road west and a toucan crossing across Bristol Road East.

6.23.9 At the mini-roundabout junction of Midland Road and Love Lane a range of pedestrian enhancements are proposed at the junction and at the Midland Road and Bridge Road mini roundabout junction.

6.24 The policies set out within this Plan support the following travel hierarchy for access and movement:

6.24.1 walking including for the passage of pushchairs, prams, and wheelchairs;

6.24.2 cycling;

6.24.3 battery powered cycles and mobility scooters and wheelchairs used by those with disabilities and reduced mobility;

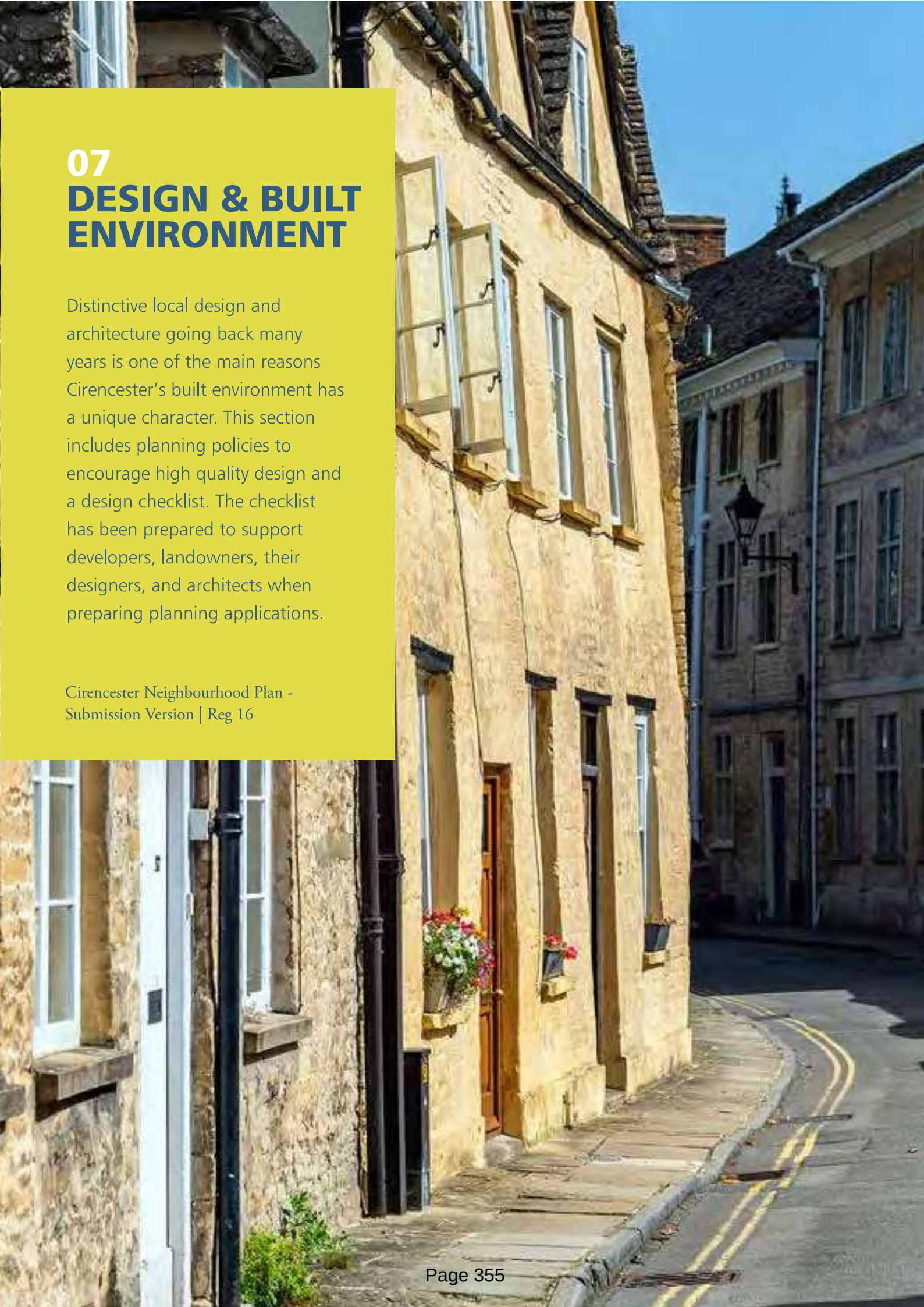
6.24.4 public transport, including tourist buses, and a plan for access to public transport;

6.24.5 car clubs;

6.24.6 electric and hydrogen propelled vehicles; private fossil-fuel powered vehicles.

07
DESIGN & BUILT ENVIRONMENT

Distinctive local design and architecture going back many years is one of the main reasons Cirencester's built environment has a unique character. This section includes planning policies to encourage high quality design and a design checklist. The checklist has been prepared to support developers, landowners, their designers, and architects when preparing planning applications.



POLICY DBE1 – DESIGN QUALITY

a) All new development proposals should have regard to the Cirencester Design Guidelines and the Cotswold Design Code.

b) Where a development is proposed in, or on the edge of an existing settlement, any new routes will respect their place in the hierarchy within the overall network.

c) The design of new development should take into account, the need to define and integrate the transition between areas of different character.

d) Where the corners of new buildings lie on the sight lines and axial views, consideration should be given to the inclusion of architectural features that form focal points.

e) Where practicable, development should incorporate publicly accessible pedestrian routes in order to maximise permeability through the town. This applies particularly where existing routes can be linked.

f) New developments should not be disproportionate in scale to adjoining buildings in the locality, unless warranted by its proposed use and position on the street.

g) Innovation in building design and materials in a way that supports local distinctiveness and other objectives for good design, as well as sustainable development and net zero will be supported.

h) New buildings within the defined Town Centre and Areas of Distinctive Character should not be more than 12 metres in height i.e. from ground level to the ridge, three storey in height, (with use of the roof space with dormer windows as a useable fourth storey habitable living space being accepted) and ridge heights to not exceed those of neighbouring buildings which set the appropriate height for a new or extended building and that the proposed design causes no impairment of light or visual impact.

POLICY DBE2 – PROTECTION OF LANDSCAPE & TOWNSCAPE VIEWS

Development proposals should demonstrate how they will protect and enhance the following views, identified as important to the landscape and townscape of Cirencester:

a) Rear of the former Watermoor Primary School: The school is currently empty and vulnerable to development. The 'glimpse' of the church spire is enjoyed as you approach from higher ground behind the premises. Roof line or development on the playing field could and would affect this. (Location: Trinity Road and Watermoor Road)

b) Churn Meadow Stratton: Towards the town, enjoyed by dog walkers and accessible for all, it is also a valued green space. (Location: Whiteway View and Bowling Green Lane)

c) Tower Street towards the St John Baptist Parish Church: A particularly significant central view, any development or change to the Police Station building could affect this approach with the Forum Car Park on the right. (Location: Tower Street)

d) The rear of the former House of Fraser building: The back of the former House of Fraser building in the Market Place, which could be described as a mismatch of previous development, still presents an aspect of the St John Baptist Parish Church that invites anticipation of what is to come and could be affected by changes to the rear of the building. (Location: 29 - 35 Market Place)

e) Somerford Road walking towards Sheep Street: Commercial buildings are probably unlikely to change but behind this aspect is Querns Lane with an empty large shop which currently has the potential to be developed into residential town houses or flats. (Location: Somerford Road)

f) Riverside Walk: Much valued Riverside Walk with open fields towards Stratton which enhance the area and its emphasis on wildlife. Probably prone to flooding and therefore unlikely to be built on but still noted. (Location: Gloucester Street and Park Street/Thomas Street)

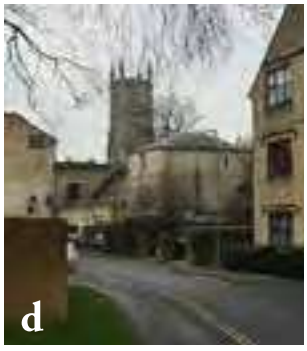
g) Powell's School Playing Fields from the Barton Allotments: Open aspect from extensive school playing fields which can 'sometimes' offer potential to reduce in size and zone for development. (Location: Barton Lane)

h) Approaching town from Gloucester Road: Could be compromised with any development of the commercial garage site on the left, or petrol station on the right of the distant eyeline. (Location: Gloucester Road)

















POLICY DBE3 – REDEVELOPMENT AND CONVERSION OF EXISTING PROPERTIES

Proposals for the merging of multiple units within Cirencester town centre will need to minimise any negative impact on the appearance and character of the town centre.

a) Redevelopment proposals will be supported where, through the design of the ground floor retail units, small, local, and/or independent traders are encouraged to locate in the town centre.

b) The conversion to residential of under-utilised commercial upper floors across the town centre will be supported to create a more vibrant and vital town centre, as appropriate to the nature of the development concerned. Support will be given if proposals are to a high design standard, respect the scale of neighbouring buildings and the ground floor continues to provide an active and animated frontage onto the street.

c) The sub-division of houses over 200m^2 gross internal floor area to create a studio, one, or two bedroomed self-contained apartments will be supported, subject to design quality, especially bin storage and parking/cycle storage.

POLICY DBE4 – PROTECTION OF NON-DESIGNATED HERITAGE ASSETS

The buildings and structures listed in Appendix 04, as shown on the Map on page 56, are identified as Non-Designated Heritage Assets and the appropriate local and national planning policies shall be applied to them.

Other NDHAs may be identified subsequently and added to the list.

POLICY DBE5 – NET-ZERO & ENERGY EFFICIENCY MEASURES IN THE DESIGN & CONSTRUCTION PROCESS

a) Proposals should demonstrate that solutions to minimise energy consumption, greenhouse gas emissions and embodied carbon have been adopted and included at each stage of the design and construction process through a Construction Environmental Management Plan.

b) Proposals should demonstrate how energy consumption, greenhouse gas emissions and embodied carbon is minimised and reduced as part of the site identification and selection process, site layout and orientation, construction methodology, thermal properties of materials, choice of glazing, choice of construction materials, avoidance of materials harmful to the environment, use of local materials and people, incorporation of sustainable modes of transport, integration with existing or planned sustainable travel networks, EV charging points for electric vehicles, flexible and adaptable space, water efficiency, incorporation of systems to collect rain and grey water, use of permeable surface and sub-base materials.

c) Proposals should follow an energy hierarchy as outlined in the supporting text.

d) Non-residential development, design and construction should comply with the BREEAM (Building Research Establishment Environmental Assessment Method) standard and achieve an 'excellent' accreditation or an alternative standard which achieves the same or better outcome.

POLICY DBE6 – ENERGY USE IN NEW BUILDINGS

a) New residential developments should not use fossil fuels on-site for space heating or hot water provision.

b) New residential developments should achieve an Energy Use Intensity (EUI) (or metered energy use) of no more than 35 kWh/m^2/year for regulated and unregulated demand assessed using energy modelling such as a Passivhaus Planning Package or similar. This is based on the total amount of energy needed within a residential building per year.

c) New residential developments should achieve a space heating demand of less than 15 kWh/m^2/year assessed using energy modelling such as Passivhaus Planning Package or similar. This is based on the level of heat energy needed within a residential building per year to maintain a regular temperature.

d) Non-residential developments should achieve an energy utilisation intensity or metered input of 55 to 65 kWh/m^2/year (subject to building use) and a space heating demand of less than 15 kWh/m^2/year assessed using energy modelling such as Passivhaus Planning Package or similar.

e) The design of new developments should demonstrate that on-site renewable energy delivers annual heating and lighting needs.

f) The strategy for metering, monitoring, reporting, energy calculations, and predicted energy use should be confirmed as part of the planning submissions for outline and detailed grant of permission and reconfirmed before the commencement of construction.

g) Variations on the requirements of this policy will be allowed only under exceptional circumstances where in complying with the above the development causing harm, or harm to the character of the wider area, or extraordinary reasons, clearly demonstrated where the standards above cannot be achieved.

DBE7 – HOMES IN MULTIPLE OCCUPATION

Proposals for the development of new Homes in Multiple Occupation (HMOs) will be supported where the development:

a) Does not harm the residential amenity or character of the locality as a result of excessive noise.

b) Does not increase levels of on-street parking, that cannot reasonably be regulated through parking control measures.

c) Does not lead to inadequate off-street storage of refuse and bicycles.

d) Is on a site in an electoral ward where under 10% of homes are currently HMOs.

e) Has no existing HMO within 5 dwellings on either side of the property or on the opposite side of the street, within 10 dwellings.

The following diagrams show a series of six indicative 'view cones' for the panoramic views of the St John Baptist church tower. These seven views referenced as glimpsed, framed and panoramic, when considered collectively, indicate that all development proposals within the town centre have potential to disrupt the important townscape setting of Cirencester.

Somerford Road





Amphitheatre - Cotswold Avenue





Preston - Kingshill Lane





Cirencester Park - Cecily Hill





Gloucester Road



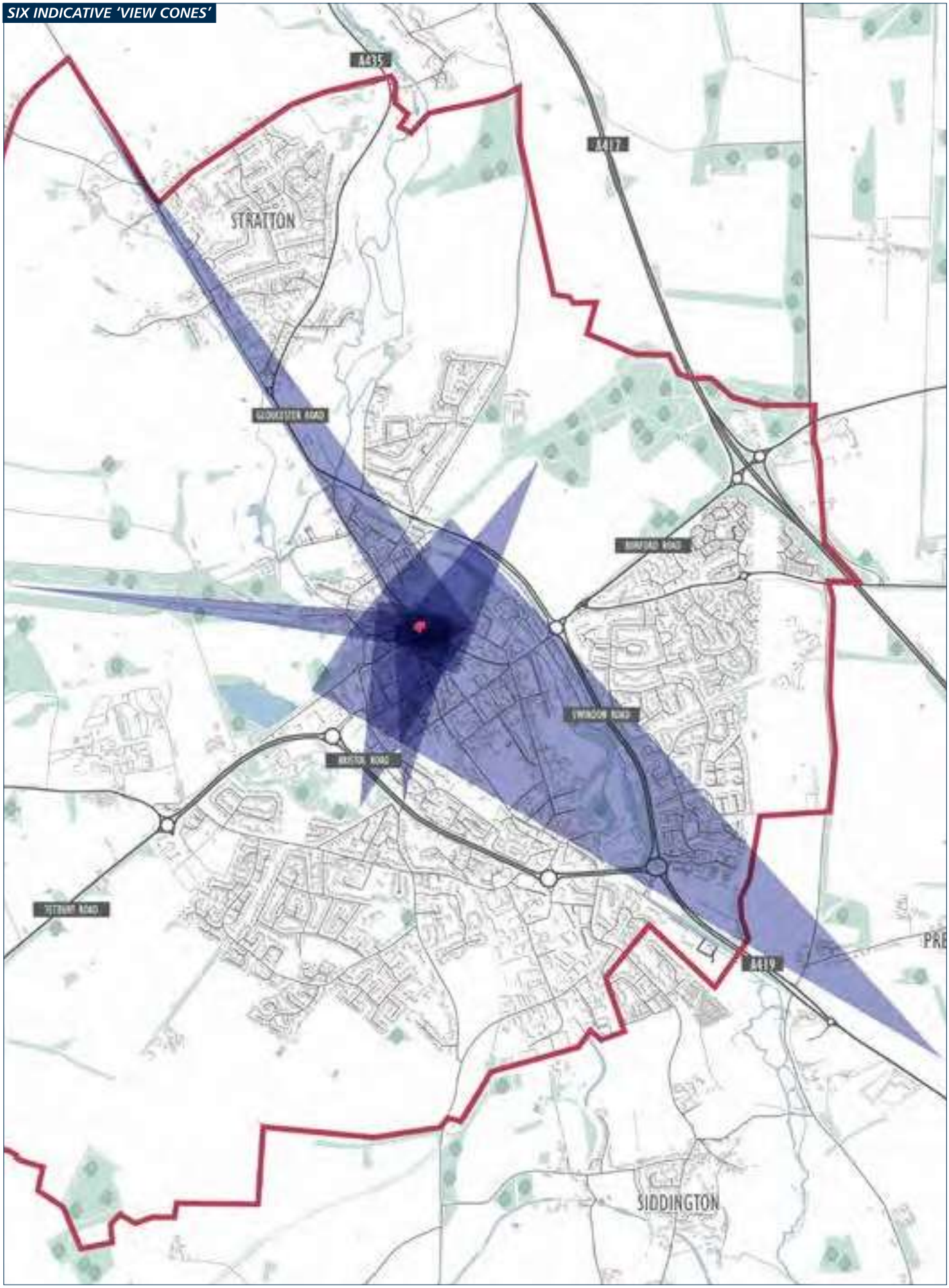


Tar Barrow - Grove Lane





SIX INDICATIVE 'VIEW CONES'



7.1 Distinctive local design and architecture going back many years is one of the main reasons Cirencester's built environment has a unique character. New developments should respond in a positive and appropriate manner to this legacy.

7.2 The Neighbourhood Plan anticipates future phases of development that are led by a more flexible use for residential/independent retail/co-worker office space, and which is generally less orientated around private car ownership.

7.3 The response to the global challenges of reducing carbon usage will help drive the shape and appearance of future development.

7.4 However, this need not necessarily conflict with the character of the town which is, as described below, composed of adjacent, differing urban forms from different historical periods.

7.5 Cirencester has experienced successive and distinct periods of growth, both commercially and in size, these include:

7.5.1 the Roman settlement, when Corinium (Cirencester) was second only to London in terms of area and economic importance. The legacy of this period includes the alignment of some roads, earthworks, and the Amphitheatre;

7.5.2 the Augustinian Abbey of St Mary. The vast land holding controlled by the Abbey shaped green spaces and watercourses existing today;

7.5.3 the high value of the medieval Cotswold wool trade brought considerable wealth to the town and helped to fund the large parish church and many large town houses;

7.5.4 the connection to the canal and subsequently to the rail network. These allowed new industrial areas to develop to the east of the town and brought cheaper brick building materials for terrace housing to be built;

7.5.5 development of the post-war motorway network. Cirencester lies at a mid-point on the A417/A419 connecting the M4 and M5. This necessitated the ring road and led to the town becoming more of a commuter town with greater emphasis on residential development and car-based retail infrastructure.

7.6 The above phases of growth are clearly legible within the town, expressed in the alignment and width of the roads and pavements, the building materials of walls and roofs, the variations in fenestration and the changing fashions of house frontages. Notwithstanding this, there are several factors that are common to all areas of the town. These include pedestrian routes through passageways and alleys, courtyards and, with the welcome exception of the tower of the parish church and the spire of Watermoor Parish Church, a general conformity of building and roof ridge heights.

7.7 In line with the principal historical phases of development, the layout and alignment of streets play a prominent role in creating each area's distinctive character. From the organic, and curvilinear shapes of medieval Coxwell Street and Gosditch Street to the straight roads of the 19th Century (Victoria Road) and the 20th Century (South Way).

7.8 The key positive qualities of the town today have been used to directly inform the design guidelines that follows at the end of this Chapter of the Plan.

7.9 The principal urban space in the town is the Market Place. In broad terms, this is dominated by the medieval parish church and south porch, by Georgian facades on the north side and Victorian on the south side. These buildings form the boundaries to the Market Place which itself curves and diminishes in width from west to east.

7.10 Cirencester has an attractive compact historic core, with a complex evolution and character of the Roman and medieval period.

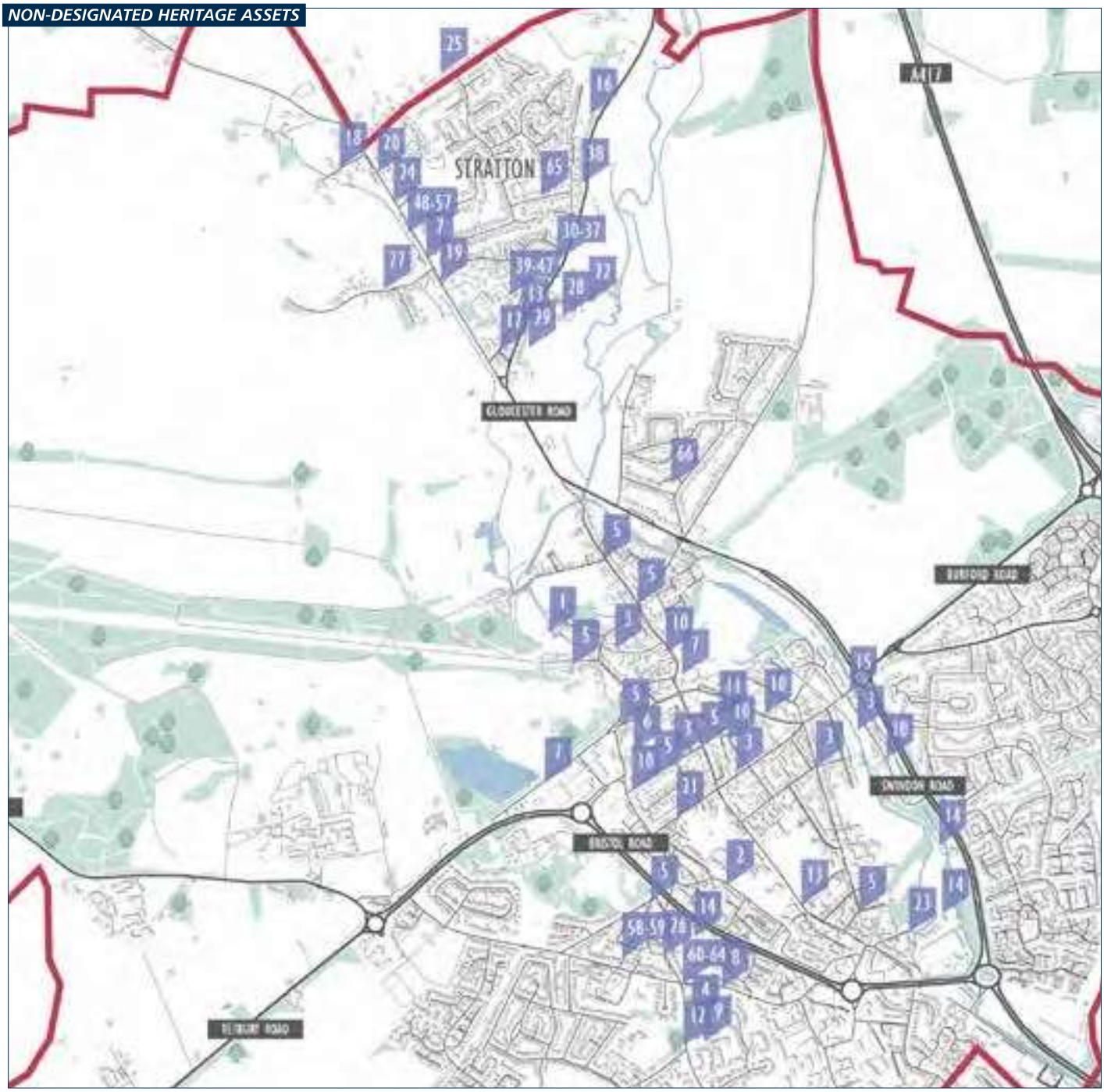
7.11 It is characterised by many protected, historic, tightly packed buildings, built up from the back edge of the pavement. They form curvilinear medieval, intimate, and enclosed street patterns.

7.12 The critically important views of the St John Baptist church tower are categorised into three types – glimpsed, framed, and panoramic. Streets such as Dollar Street, Black Jack Street, and The Waterloo all benefit from glimpses of the tower rising above the contextual rooflines whereas South Way, Tower Street and the Broad Ride within Cirencester Park are consciously aligned axially to the tower.

The prominence of the tower stands as a landmark from the approaches to the town, from Gloucester, Cricklade and the Whiteway.

7.13 Pedestrian passageways through and between buildings make an important contribution to free movement within and access to the public realm, for example from the Market Place toThe Waterloo, to the Abbey Grounds via the closed church yard and to Swan Yard. Other roofscapes of note are the Brewery buildings in Cricklade Street (now residential) and the Waitrose building in Hammonds Way.

7.14 The architecture of the buildings responds to their position within the street, especially on corners, where, for example the former HSBC bank on Cricklade Street, Lloyds Bank on Castle Street and the Corinium Museum on Park Street and Silver Street all display a higher order of architectural style from turrets to Palladian facades.



For more details please see Apendix 04



7.15 Where given the space to develop and properly mature, trees make an important contribution to the public realm, creating screening, providing shade and biodiversity habitats. Successful examples of this are the Lebanese cedar and False Acacia in West Market Place, the Hornbeams and Planes in Brewery Court and the Beech trees in The Waterloo.

7.16 Street furniture, which includes benches, bollards, cycle stands, litter bins, signage, lighting, and advertising are generally designed to be seen and therefore play a prominent role in defining the character of the street. Cirencester displays a range of styles from traditional metal (Victorian) in West Way and Gloucester Road, to contemporary stone and timber in the Market Place and Brewery Court with future public realm being influenced by Cirencester Town Council's Town Centre Public Realm Design Code.

7.17 As is the case with most historic towns, Cirencester is a palimpsest of urban development. This has evolved over many centuries and as a result, within the public streetscapes, it now expresses a wide range of built forms that have been shaped in large part by commercial need and architectural fashion. In marked contrast to these picturesque and protected facades, the rear elevations of the properties have developed in a more ad-hoc and utilitarian manner.

7.18 This contrast in quality applies particularly to the rear elevations that form the visual boundaries to the Brewery and Forum car parks. This visual enclosure creates the opportunity for a more contemporary architectural style and to help it adopt a form of building design whose shaping and appearance incorporates the requirements to achieve a low carbon building at the construction stage, during its maintenance lifetime, and at its demolition and recycling.

7.19 For these measures to be integrated into the design of the building fabric this will affect various building elements e.g., the size and appearance of the fenestration, the incorporation of photovoltaic panels and the orientation and pitch of the roofs.

7.20 Whilst these aims may result in a different architectural character, they do not exclude the adoption of important elements of the historic urban centre, that is the inclusion of features such as arches and passageways through and between buildings to maximise permeability and the use of materials sympathetic to the colour and texture of the local limestone.

7.21 New development that is situated beyond the historic streetscapes e.g. within the Brewery, Forum and Waterloo car parks and Phoenix Way, may make use of modern design and materials that contrast with, yet complement local character. The obligation to develop low carbon buildings with an inherently low carbon construction and maintenance cost will drive a different aesthetic from the traditional Cotswold vernacular, i.e. in terms of their size and framing as well as roofscape design that allows the more effective performance of PV panels.

7.22 New development should respect and respond positively to the character of the Cotswold vernacular and distinctiveness, including protecting and enhancing the historic environment of the town and providing value to the public realm. Good, contemporary design that is complementary to the historic environment will be acceptable and preferable to pastiche.

7.23 The need for high quality design is a core principle of the National Planning Policy Framework (NPPF). It emphasises that "good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities". It goes onto say that "Neighbourhood Plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development". Cirencester has grown over time, with the historic medieval core responding to its location and cultural heritage, the surrounding landscape and built form, and with the use of traditional materials that reflected the geology of the wider area. These elements help shape the character of the built form.

7.24 Cirencester is a growing town with an historic core within the town centre, which should be protected to retain the special historic character.

7.25 The siting and design of new buildings plays an important role in how a place functions and contributes to reinforcing local character and a sense of place. Buildings should generally be sited and designed (in terms of scale, mass, width, size, architectural quality, and material used) to enclose streets and spaces and contribute to legibility and wayfinding, to reinforce the existing historic medieval urban grain and quality, making it easier for people to find their way around. Well designed, beautiful buildings with high quality materials can bring variety and vibrancy to an area and contribute to the local distinctiveness of a place.

7.26 The Cotswold District Local Plan preserves key views in D66 of the Cotswold Design Code with no greater definition or audit of what these are. The Conservation Area views are essentially protected but areas of the town such as Watermoor with approaching glimpses of the town or approaches from outlying highways such as that from the A417 have less protection.

7.27 The Neighbourhood Plan, rooted in community appraisal of what is felt important to protect, provided an opportunity to highlight and document those valued by residents to ensure higher protection, assisted by the Civic Society members. These views are subsequently supported by the Cirencester Conservation Appraisal draft map.

7.28 Many views are iconic and have a degree of protection by being surrounded by or within Conservation Areas, each view known for its distinctiveness, visual impact, visibility, and sense of place. Others are glimpses of the wider landscape such as the Amphitheatre or landmarks such as the former malthouse on Cricklade Street.

7.29 Vulnerable views have been identified as having some potential to be negatively impacted by development, especially where buildings may change, be demolished, and replaced with taller buildings. The eight views identified within Policy DBE2 have the potential to be particularly compromised by development and are considered to fit this description. Equally, views to and fromthe Cotswolds National Landscape and the tranquility of the national landscape should not be adversely affected by development within the Plan area.

7.30 Changing patterns of economic activity across the town centre, including the decline in retail activity, has left many units empty. Even those that are occupied at ground floor level often have unused upper floors above shops and commercial premises. Bringing these upper floors back into use as residential accommodation would meet housing needs and increase town centre footfall leading to a more vibrant local economy. Meanwhile, sub-division of large houses can make more efficient use of the existing historic built form, to satisfy a housing need for smaller sized accommodation and increase the vibrancy of the neighbourhood and the housing mix and density.

7.31 Furthermore, this would increase housing in a sustainable location, which would encourage less car reliance and help reduce carbon footprints. It would also increase night-time surveillance of the public realm, making it safer.

7.32 Redundant commercial buildings and large residential houses should be the focus of Policy DBE 3, to encourage the efficient reuse of existing embodied energy within structures. This also helps to provide much needed homes for the smallest household size, as starter homes for first-time buyers, affordable homes for key workers and young people, as well as for more elderly households. Town centre living, with its proximity of services, and the reduced need for larger dwellings, appeals to all these cohorts.

7.33 Smaller retail floor plates (< 300 sqm) can often be more attractive to small, local, and/or independent retailers than large format units and therefore redevelopment proposals should include a significant proportion of retail units of 300m² or less.

7.34 All heritage assets have significance, either with designated status or as a non - designated heritage asset. The contribution made by their setting to the significance, also varies. Although many settings may be enhanced by development, not all have the same capacity to accommodate change without harming the significance of the heritage asset or the ability to appreciate it. Within and beyond the Conservation Areas of Cirencester there are many unlisted features,

buildings and structures that contribute to the visual, architectural, and social history of the town.

7.35 Representative of architecture styles, commercial life, or industrial activity, non-designated heritage assets are distinctive, contributing to evidence of local life. These types of assets can be removed or altered. This policy aims to retain and enhance high quality, locally important, buildings and structures over the town and in the Conservation Areas, and to avoid the danger of heritage assets being allowed to be neglected leading to demolition or removal. This includes unprotected high-quality heritage buildings and unique reminders of Cirencester's past.

7.36 The Somerford Road area and industrial heritage in Watermoor, includes architectural features such as industrial signage, older street name plaques, rare post boxes, and commemorative street benches which are unlisted.

7.37 Several are representations of the evolution of the town, architecturally and socially, particularly over the last century during industrialisation and merit consideration in planning decisions which should exercise a balanced judgement on their contribution to the setting, history, and character of the town.

7.38 The industrial legacy of the town is particularly shown by commercial signage and parts of the redundant railway network with the social history of commemorative benches, street signs and post boxes.

7.39 The current position regarding Non-Designated Heritage Assets (NDHA) in Cirencester is reflected in the adopted Cotswold District Local Plan suggesting development affecting a NDHA will be 'permitted' where it is sympathetic and enhances the character or will be 'resisted'.

7.40 The Neighbourhood Plan has the scope to protect an NDHA from inappropriate demolition or alteration, and subject to being based on sound evidence and in keeping with the National Planning Policy Framework, has identified NDHAs in Cirencester and established a local NDHA list.

7.41 The Neighbourhood Plan Steering Group formed a sub-group supported by a Heritage Officer from Cotswold District Council and requested nominations from stakeholders such as the Civic Society. An advert asking the public for suggestions, was placed in a local publication, Cirencester Scene, which is distributed free to each household and business in the town.

7.42 A list of approximately 80 submissions was assessed for appropriateness for designation, assisted by advice from the Heritage Officer and using the Historic England criteria outlined below:

7.42.1 ARCHITECTURAL: the age and locally distinct in material retaining significant structure;

7.42.2 ARCHAEOLOGICAL: supported by clear evidence;

7.42.3 GROUP VALUE: having association through use or design;

7.42.4 RARITY: as judged against other features;

7.42.4 LANDMARK: is it striking and with strong association with location, event, or community;

7.42.5 DESIGNED LANDSCAPE: such as a garden setting, structured landscapes, and parks;

7.42.6 EVIDENTIAL: is there documentation of past historical use or history;

7.42.7 COMPLETENESS: is there enough fabric and features to be understood;

7.42.8 SOCIAL HISTORY: features that are illustrative of historic local life;

7.42.9 ECONOMIC HISTORY: illustrative of historic commercial activity;

7.42.10 COMMUNAL VALUE: connected with collective local memories.

7.43 Further NDHA's may be identified in the future that meet the Historic England criteria, provided evidence for the justification is included.

7.44 The benefit will be the further and greater protection of the less observed and previously noted heritage of the town including its social, commercial, and industrial evolution.

DESIGN AND ISSUES OF SUSTAINABILITY

7.45 The Neighbourhood Plan aims to drive net-zero carbon development within Cirencester through sustainable design, build, and operation of new development and development with outline permission. The policies in the Plan aim to adapt Cirencester's building stock to mitigate the effects of climate change, contributing to the national target of net-zero carbon.

7.46 There is a climate emergency (Source: Intergovernmental Panel on Climate Change Reports, Climate Change Committee Reports and pathways, Cotswold District Council declaration, and Cirencester Town Council declaration). The UK has legislated for net-zero by 2050 (The Climate Change Act 2008, as amended). The Committee on Climate Change (CoCC) pathway to net- zero includes ultra-efficient new buildings, low carbon heat and ambitious retrofit to existing buildings.

7.47 The National Planning Policy Framework (NPPF) requires a positive strategy to deliver renewable and low carbon energy and heat and makes clear that the planning system should help shape places to radically reduce greenhouse gas emissions. The UK Government considers local authorities are best placed to drive local progress towards national climate change commitments. The updated Cotswold District Local Plan aims to be green to its core to support the aim of achieving net-zero (Source: CDC priorities, April 2020 and partial update to the Local Plan).

7.48 Engagement with the public as part of the preparation of the Neighbourhood Plan identified heritage, better town integration and climate change as the top three most important aims indicating broad agreement for measures to mitigate and adapt to climate change. Wider consultation supports a vision which places climate change mitigation on the same level as both heritage and better town integration.

7.49 For Cirencester to respond to the Town Council's 2019 Climate Emergency declaration and contribute to national targets, each type of building will require a different approach. The design, development and operation of new development should be net-zero, also referred to as carbon neutral.

7.50 Whilst it is recognised that land with extant planning permission cannot be required to build to a higher standard than building regulations, it is a community aspiration to work positively with developers and the regulatory planning authority so that all future housing is built to a net-zero standard.

7.51 This will not be possible, or certainly very difficult, for existing building stock to achieve and a different approach will be needed such as an ambitious approach to existing and heritage building stock which improves performance equivalent to an energy performance certificate of at least EPC C or similar.

7.52 The Neighbourhood Plan recognises that design and build to Building Regulations, Part L and Future Homes 2025 will not achieve carbon neutrality and sets reasonable targets that exceeds these regulations.

7.53 The UK Green Building Council defines a net-zero carbon operational building as: "the amount of carbon emissions associated with the building's operational energy on an annual basis is zero or negative. A net zero carbon building is highly energy efficient and powered from on-site and/or off-site renewable energy sources, with any remaining carbon balance offset."

7.54 The policies in this Neighbourhood Plan set clear and measurable outcomes through specifying energy targets which are supported by the Royal Institute of British Architects (RIBA), the UK Green Building Council (GBC), and the Climate Change Committee (CCC), a statutory body established under the Climate Change Act 2008.

7.55 Furthermore, the policies in this Plan, recognise the construction industry, and its clients are increasingly active in achieving net-zero buildings with available and affordable skills, techniques, and technologies. Occupants and owners are also seeking energy efficient buildings, partly to meet their green agenda and partly to reduce through-life cost of space heating.

7.56 Policy DBE5 aims to establish a process during the development, design, build and operation to minimise energy use and greenhouse gas emissions, and set out adaptations to mitigate the impact of climate change. The term embodied carbon is used as reference to emissions relating to the materials and

construction processes of a building or infrastructure (e.g. the materials or products used to construct, maintain, repair, refurbish and repurpose a building).

7.57 The energy hierarchy takes a fabric first approach to maximise the energy and thermal performance of the fabric of the building, minimising energy use, before considering other items in the list. LETI (London Energy Transformative Initiative) has modelled energy performance which shows that a fabric first approach increases capital costs by 4.8% compared to Building Regulations, Part L. The running cost is reduced by 25% to 50% compared to Part L and Future Homes.

7.58 This approach means buildings will be warm and comfortable with minimum energy usage and, in the short and long term, significantly reduce the energy cost of keeping the building warm.

7.59 The following energy hierarchy places the most favourable option at the top, and least favourable at the bottom. The first option is to be fully utilised before moving to the next option.

7.60 The energy hierarchy is:

7.60.1 fabric-first to minimise overall and space heating demand before considering other options;

7.60.2 maximise energy efficiency within the building;

7.60.3 incorporate renewable energy;

7.60.4 use low carbon energy; and as the last option,

7.60.5 use other sources of energy.

7.61 The UK's Climate Change Committee (CCC) states that retrofitting measures to mitigate climate change including improvement to the thermal performance of the building fabric are five times more expensive than if the same measures were installed at build. It is better to include measures to adapt to, and mitigate, climate change at the design and build stages.

7.62 The energy utilisation and space heating demands set out in the policy are recommended by LETI in its Climate Emergency Design Guide and supported by RIBA, UKGBC and the CCC as targets necessary to achieve carbon neutrality. LETI provides a common set of metrics and targets which allow new buildings to achieve net-zero or carbon neutrality by 2030.

7.63 These targets are being implemented by several planning authorities both in emerging and made local plans. The partial update to the Cotswold District Local Plan refers to the LETI design code. The clear targets in Policy DBE 6 can be monitored and measured through utility meters installed in each building.

7.64 Design, development, and construction should comply with the BREEAM (Building Research Establishment Environmental Assessment Method) standard and achieve an 'excellent' accreditation or an alternative standard which achieves the same or better outcome.

7.65 Homes in Multiple Occupation (HMOs) form an important part of the town's private rented accommodation, providing homes and contributing to housing choice. HMOs are generally more affordable and flexible and can be suitable for younger people and other households not living as families. Increasing numbers of individuals are unable to afford to buy a home or rent a flat in the town due to increases in costs and so access to HMOs is important for these individuals. Sharing homes can also help younger people, especially newly arrived in the town, to form new networks and relationships. It is also important to support further education establishments, like the Royal Agricultural University (RAU), to provide suitable student accommodation.

7.66 While the town's stock of HMOs is contributing to meeting housing needs, creating a greater mix of residents, and a more balanced community, they can also create harmful impacts, which affect community's health and wellbeing, for example through noise and disturbance, poor waste management, increased pressure for on-street parking and a more transient community lacking cohesion.

7.67 It is a higher concentration of HMOs in specific neighbourhood areas that is having the most negative impact on local communities.

7.68 The largest proportion of demand for HMOs in the town is from the student community attending the Royal Agricultural University

(RAU). The Gloucestershire Local Housing Needs Assessment (ORS 2020, LHNA) notes that the RAU has 1,200 students and aims to increase this to 1,500. There are 870 living off campus mainly in the town's privately rented sector.

7.69 This could therefore increase by 300 to 1,170 students if no new purpose-built student accommodation is provided. Assuming 3.6 students per dwelling, an extra 83 student HMOs could be needed, leaving aside those who are forced to live in neighbouring villages or towns due to the lack of availability.

7.70 The 2011 census suggests there are around 315 homes within Cirencester with 'no usual' residents, being around 3.6% of the total housing stock (8,717) which is low compared to the rest of the Cotswold district. Cotswold District Council's public protection team have a record of 42 licensed HMOs, being over five residents per dwelling, with over half in the electoral ward of Chesterton. There is a need for more local housing data on existing HMOs from Cotswold District Council and Gloucestershire County Council.

7.71 But even with limited data, there appears to be a need to avoid concentrations of HMOs by spreading them more evenly across the town, despite the student's natural desire to live closer to the University.

7.72 Small HMOs occupied by between 3 to 5 individuals and who share basic amenities such as a kitchen, bathroom, or toilet, are not covered by this policy as they have permitted development rights. Only large HMOs, of more than 5 individuals, are covered by this policy, as these require planning consent.

7.73 The purpose of Policy DBE 7 is to prevent harm to the character, appearance of the property, adjoining properties, or their local context. Furthermore, to prevent an unacceptable impact on the amenities of adjoining neighbours, including the need for sufficient amenity space, refuse storage, and car and cycle storage to a suitable standard. The aim of the policy being to avoid an over concentration of HMOs in any one electoral ward.

7.74 Policy DBE 7 is needed to help deliver the increased student accommodation needs resulting from growth of the RAU, and of other young single residents, finding it difficult to find affordable accommodation, in a sustainable way. Reducing the potential harmful impacts on communities that could occur from high concentrations of HMOs, it will also ensure that HMOs can continue to form part of the town's housing stock, particularly close to local amenities, and provide an affordable form of accommodation for those that need it.

CIRENCESTER DESIGN GUIDELINES FOR NEW DEVELOPMENT

7.75 The design guidelines have been prepared to support developers, landowners, their designers, and architects when preparing planning applications. It is intended to be used as a reference point in support of the planning policies within the Neighbourhood Plan, acknowledging that Cirencester has various character areas and different architectural approaches.

7.76 Whilst there is a vast range of qualities that contribute to the overall sense of place, the primary components are the built form (the layout & arrangement, scale, massing, and details of the building that enclose the streets and spaces) and the public realm (the streets and spaces, as formed by the enclosure of the adjacent buildings).



7.77 The guidelines are set out within the following categories:

7.77.1 Layout & Arrangement

7.77.2 Height & Scale

7.77.3 Materials & Details

7.77.4 Resource Efficiency

7.77.5 Streets & Spaces

7.78 LAYOUT & ARRANGEMENT

7.78.1 The scale of new development should be in keeping with the historic urban grain, to help to create a sense of enclosure to streets and spaces, but also reflect the great variety of building scales within the historic core.

7.78.2 The contribution made by the historic urban grain, and the style and materials of its buildings, should be reflected within all town centre redevelopment proposals.

7.78.3 The density of development should encourage the efficient use of land which can bring the benefits of social vibrancy and interaction, as well as security of streets by passive surveillance, while ensuring privacy. It should reflect the hierarchy of urban density, highest within the historic town centre and neighbourhood centres, and reduce towards the peri urban areas, with increased green spaces.

7.78.4 Increasing the density of existing low-density suburban areas by high quality roof and rear extensions will be supported, whether they are traditional or contemporary in design. This increase in population will help to support local facilities and reduces the pressure to develop green field sites.

7.78.5 Where new plots are being formed, these should reflect the existing grain and pattern of development where they form a significant characteristic in the street scene, unless this would conflict with other policies.

7.78.6 New development within the town centre and Conservation Areas, should develop a sense of place that reflects, reveals, celebrates, and contributes to the layers of history.

7.78.7 Street sections and block sizes should reflect and reinforce the existing medieval hierarchy found elsewhere in the town. Application of these street sections to the opportunity sites will ensure an appropriate response to the Cirencester context. Narrow street sections will also provide shade as part of a response to climate change and ensuring a resilient town.

7.78.8 Increase the mixed use of buildings by, for instance, converting commercial upper floors to residential and incorporating shops and offices within residential buildings.

7.79 HEIGHT & SCALE

7.79.1 The local character of Cirencester is defined by a great diversity of urban forms and scales which have evolved over time and with important public and religious buildings breaking through to create a dramatic skyline (St John Baptist Parish Church in the Market Place and the Watermoor Parish Church). Buildings within the historic core should be no more than three storey plus an extra attic within the roof space, to a maximum height of 12m above ground level.

7.79.2 The creation of a hierarchy of buildings that differ in scale and order when located on prominent corners or where they form the focal point, for example as a result of a bend in the road which places a building at the end of a sight line, will be supported.

7.79.3 All proposed roof heights for new development must not damage the setting of the town's significant listed buildings. Also views of these buildings from within the town and from the outlying countryside should be retained. So, within these cones of view, overall building heights of development will be limited.

7.79.4 The Cotswold style roof pitches and Arts & Crafts local tradition tend to be over 45 degrees, while the Georgian design uses parapet walls and low-pitched roof. These storey heights are important in creating the established urban form of the town and fourth storey rooms in the roof will be encouraged. Roofline silhouettes which assimilate well with adjoining properties and skyline will be encouraged.

7.79.5 To make best use of space, roofs that can provide complementary amenity uses will be considered. On a wide span building, this might include a bowling green or for a raised deck car park a treed-roof garden.

7.80 MATERIALS & DETAILS

7.80.1 Buildings should be designed with construction details and materials which ensure both a long life and minimal maintenance. Poorly specified materials and details can cause a rapid deterioration in the building's appearance and that of its setting. The need for building maintenance should be designed-out to avoid this danger as well as reducing its lifelong maintenance carbon footprint.

7.80.2 All new developments should be designed and built to achieve the highest standards of urban appearance over its life-time.

7.80.3 Concrete materials, like reconstituted stone and reconstituted stone tiles, which have very high embodied energy, will not be supported.

7.80.4 Respect for the appearance of adjoining properties and the local neighbourhood, by the use of high-quality design and natural local materials, will be supported. The appearance of natural materials, with low embodied energy, if well detailed, can bring variety, local distinctiveness and vibrancy and will improve in appearance as materials weather.

7.80.5 New development within the traditional, historic streetscapes should respond positively to the Cotswold vernacular and to the distinctive Cirencester context. Proposals for new development (both residential and commercial) in the Plan area should demonstrate architectural design standards of the highest quality and maintain and enhance local character.

7.80.6 New development should reflect the local building forms and traditions, material and architectural detailing that are significant in the local area, and maintain or, where appropriate, enhance local character.

7.80.7 The use of imaginative, innovative, and contemporary designs and materials which enable buildings to achieve net zero construction performance and promote sustainability, without harming the character of the Conservation Areas, will be supported.

7.80.8 The size, proportion, materials and detailing of replacement windows should reflect the original within Conservation Areas and those listed as Non-Designated Heritage Assets.

7.80.9 The removal of historic architectural details including chimneys, which could detract from the appearance of the original structure will not be supported within Conservation Areas and Non-Designated Heritage Assets.

7.80.10 Shop fascias and hanging signs, including illumination and size, within Conservation Areas and Non-Designated Heritage Assets, should be of a design in keeping with the character of the area.

7.80.11 Windows and doors should be setback behind the wall face to create a 100mm reveal, and stone cills with a 50mm overhang. This creates a shadow to the reveal and creates a sense of solidity.

7.81 RESOURCE EFFICIENCY

7.81.1 All new developments should be built to net-zero construction and energy efficient building methods.

7.81.2 The design of a new development should minimise its embodied energy used within the provision of its materials and construction. The sourcing of local materials, and the reuse and recycling of existing materials will be encouraged.

7.81.3 Existing buildings should be retained and upgraded to the same high energy efficient standard as new build, only where there is a saving in the use of embodied energy.

7.81.4 All development should increase the potential for ecological biodiversity, not only through the design of the buildings but also through its external materials, organic plant selection and varied landscaping.



7.81.5 On-site generation, such as solar PV (photovoltaics) and heat pumps, should be considered from the outset of the design process.

7.81.6 Measures to conserve and recycle water should be demonstrated by all new developments. Sustainable urban drainage design should be included within all development to ensure that the project does not increase the risk of flooding adjoining properties.

7.82 STREETS & SPACES

7.82.1 Development proposals should create layouts and alignment of streets which both curve and vary in width, to form a staggered building line and protected areas at street level.

7.82.2 The layout of streets, courtyards and building footprints should allow glimpsed views of the St John Baptist Parish Church tower, or where appropriate, incorporate open vistas to the tower.

7.82.3 Provide sufficient space for trees to develop and properly mature. Select species for approval by the Cotswold District Council Tree Officer and include root barriers, permeable tree guards, irrigation pipes and a commitment to on-going maintenance.

7.82.4 The streets are to be designed to allow the free movement of pedestrians prioritised over cyclists who in turn are prioritised over vehicles. In addition, there should be segregated (or areas delineated by bollards) that exclude vehicles altogether to allow the temporary and informal use of space for seating, vendors, and performance.

7.82.5 Designated cycle routes will be incorporated into developments to contribute to the linking of established Sustrans cycle routes with the town. The width of allocated land for these routes should

be sufficient to allow native hedgerows and trees to establish and thus provide the additional benefit of a wildlife corridor to connect pockets of biodiversity.

7.82.6 The spatial arrangement of differing but complementary surface materials, channels and edgings will be arranged to form a shared space, that is to delineate the traditional carriageway pattern in order to discourage any sense of vehicle 'ownership' and therefore any assumption of priority. Where car access and parking is required, vehicle speeds will be restricted. On-street parking within the public realm will be time limited with private parking within communal courtyards located to the north of the built development.

7.82.7 Buildings will incorporate publicly accessible passageways leading to footpaths, the location of which will be led by the natural desire lines between destinations.

7.82.8 Public art, typically interpreted as sculptural, has the potential to express and communicate important cultural and social concepts. The form that it takes, be it literal and figurative or more abstract can be divisive. It differs from the design language of other street furniture in that contemporary pieces are often seen successfully within more historic settings. The inclusion of public art should be considered from the outset of the design process.



7.82.9 Incorporate designated locations for future public art commissions including raised empty plinths.

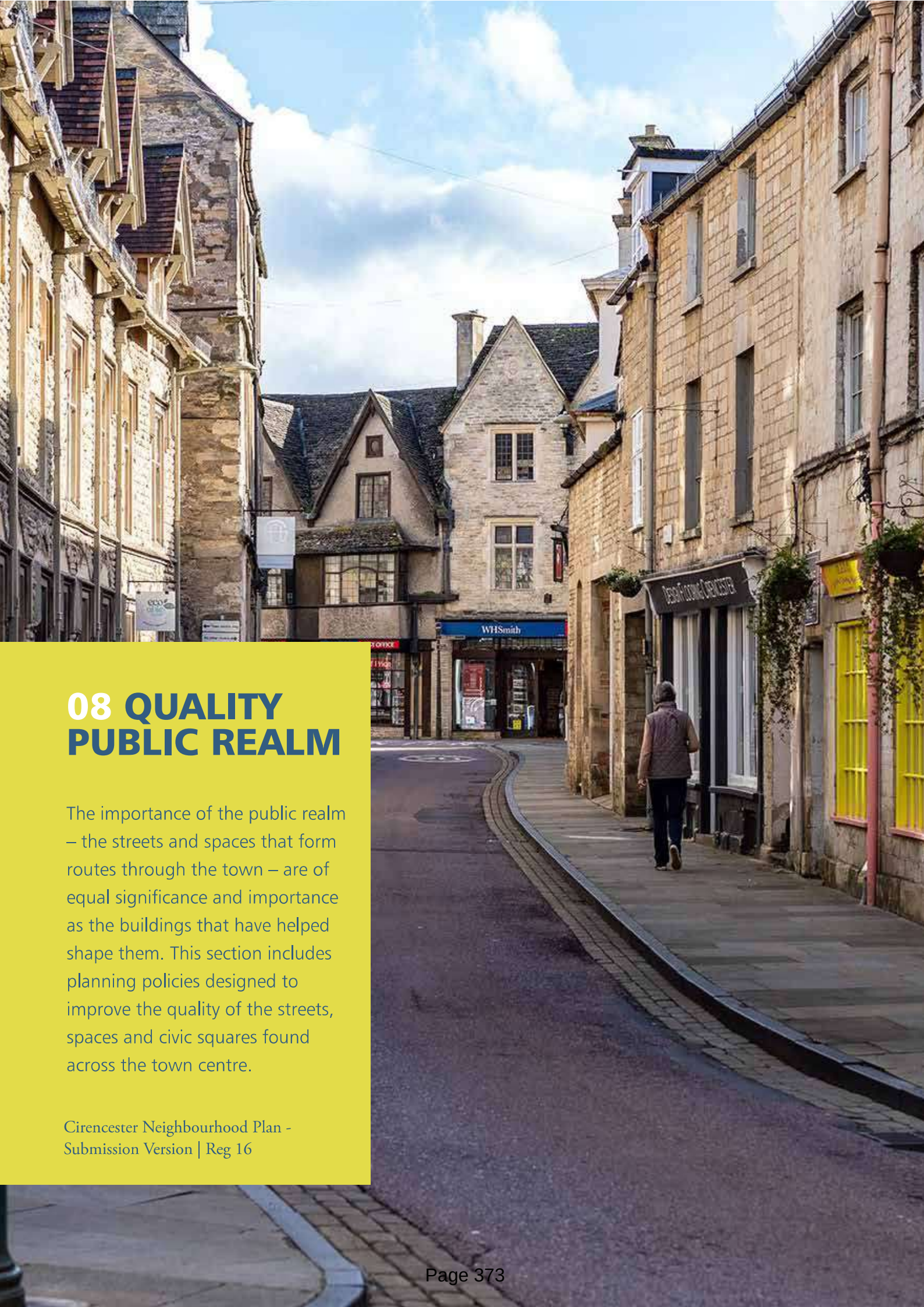
7.82.10 External public street lighting should ensure the safety and security of pedestrians and cyclists. It should be as unobtrusive as possible and integrated into the landscape. Doors and windows facing the street, when lit at night, can reduce the need for external lighting and ensure that people feel safe.

7.82.11 Pedestrian routes should be prioritised with open spaces, and wild areas should be left unlit to avoid pollution, light spillage, and harm to wildlife.

7.82.12 Street furniture, benches, bollards, cycle stands, bins, signage, and lighting should be sympathetic to the contextual architecture and any existing retained furniture and respond to the needs of those who have a visual impairment or are less mobile.

7.83 Cirencester's need for new housing and its contribution to the district's housing need to 2033, already has a grant of outline permission. Whilst recognising that this cannot be achieved retrospectively through the planning regulatory framework, it is a community ambition that the design, construction and operation of such housing should also be net-zero.

7.84 It is acknowledged that on-site renewable energy may not meet all the needs of occupants due to high demand, this is a community aspiration.



08 QUALITY PUBLIC REALM

The importance of the public realm – the streets and spaces that form routes through the town – are of equal significance and importance as the buildings that have helped shape them. This section includes planning policies designed to improve the quality of the streets, spaces and civic squares found across the town centre.

POLICY QPR1 – ILLUMINATED SIGNAGE

Unless it can be demonstrated that the introduction of free standing and wall mounted structures with digital or illuminated advertisements have no detrimental visual or acoustic impact on the town centre Conservation Areas i.e. that they are contained discreetly within the fabric of buildings, proposals to introduce these or similar structures will not be supported.

POLICY QPR2 – QUALITY STREETS & SPACES

a) Development proposals that protect and enhance the Areas of Distinctive Character which include a network of historic streets, parks, gardens, and public open spaces will be supported.

b) Development proposals within the town centre boundary and areas of distinctive character as identified within Policy TC1 which use the palette of heritage materials outlined in the Cirencester Town Centre Public Realm Design Code will be supported.

POLICY QPR3 – SOCIAL & CIVIC SPACES

Where appropriate, new developments will be supported where they provide a clear network of well-designed social and civic spaces that can help support the cultural, social, and economic life of the town.

POLICY QPR4 – HERITAGE TRAILS & WAYFINDING SYSTEMS

Insofar as planning permission is required, proposals for heritage trails, wayfinding systems and the improved signposting of existing pedestrian and cycle routes within the town will be supported. Proposals that would facilitate better connections between the town centre, the surrounding areas and the wider countryside will be particularly encouraged.



8.1 The importance of the public realm, the streets and spaces that form routes through the town, are of equal significance and importance as the buildings that have helped shape them. Their value transcends the mere functional aspect of creating links between destinations. They provide the principal infrastructure for social engagement within the town, from large formal gatherings such as the Remembrance Day Parade and Mop Fair to the Charter Markets and chance meetings that occur between friends and acquaintances.

8.2 The current arrangement of streets and open spaces belong to three distinct phases of development: the Medieval, the Victorian & Edwardian and the Modern 20th Century streets (Source: Cirencester Town Centre Public Realm Design Code – a Cirencester Town Council commissioned document through Portus and Whitton):

8.2.1 MEDIEVAL STREETS: these form the town historic core and the streets to the north. They are typically narrow winding streets, with Cotswold stone buildings. There are, nevertheless, a number of notable Georgian buildings within this medieval core.

8.2.2 VICTORIAN & EDWARDIAN STREETS: many of these developed following the arrival of the railways. As a consequence, the materials are more varied with the widespread use of red brick evident in some streets. They are mostly located to the south of the town centre, closer to the railway sidings and wharfs. These streets typically adopt a rectilinear street pattern and are wider sometimes including formal street tree planting.

8.2.3 20TH CENTURY STREETS: these have been developed during the interwar and post Second World War periods. This includes peripheral areas of redevelopment around the edges of the town centre as well as larger swathes of development that took place following the closure of the railways in the 1960s.

8.3 All three streetscapes were established before the meteoric rise in private car ownership post 1945. The prevailing sentiment within highway departments was to re-engineer town centres and maximise capacity for vehicle movements.

8.4 In Cirencester, this resulted in four lanes of traffic within the Market Place including areas of deterrent paving to dissuade pedestrians from crossing the road. Continuing growth in car ownership resulted in the creation of the ring road. The legacy of this within the town centre was a predominance of tarmac surfacing, concrete kerbs and narrow pavements which are unattractive to look at, less accommodating for public events, particularly problematic for buggies, mobility scooters and wheelchairs and unworthy of the many listed buildings.

8.5 To remedy this, two main schemes in the town centre have taken place, the re-surfacing works to Park Street and Silver Street and the regeneration of the Market Place as a pedestrian priority space, whilst providing less dominant vehicular access to local amenities.

8.6 The success of these schemes, set the template for further enhancements within the wider town centre. The aims of which are set out in the Access and Movement section of the Plan under Policy AM 3, which relate to the dynamics of pedestrian movement, in contrast to the experience as outlined in this section of the Plan.

8.7 With changes to the one-way system, the latter reduced the volume of regional cars within the town, created significant areas of pedestrian space using high quality street furniture and surface materials and was detailed in a way to respond to and enhance the setting of the buildings. Since its completion in 2017, awareness of the impact of car exhausts and particulates has increased, strengthening the case for the reduction of vehicles in town centres.

8.8 In referring to these aims, the principal objectives are to:

8.8.1 reduce further the volume of regional traffic that uses the town centre as a short cut;

8.8.2 widen pavements and thereby reduce carriage way widths to favour pedestrian space and inhibit traffic speeds;

8.8.3 implement a programme of resurfacing which creates a pedestrian priority environment;

8.8.4 remove unnecessary street clutter and introduce additional tree planting and seating within these areas that follows an agreed design language appropriate to its context.

8.9 The selection of street furniture in style, colour and material can complement, strengthen, and enhance the contextual architectural character. This applies to features such as seating, litter bins, cycle racks and bollards. Where wider uniformity is helpful, i.e. to signage and heritage trails, a more neutral functional appearance will be supported. This applies to the font, the base colour, and absence of period embellishment.

8.10 Cirencester's gateways, the 'points of arrival', are described as the location where, on approaching the town centre, the viewer becomes aware of crossing the threshold into the historic core. This awareness is often heralded by the view of the St John Baptist Parish Church tower, situated in the Market Place. The gateways into the town strengthen the sense of place and where they coincide with a 20mph zone, they act as a signal to car drivers that they are entering an area where pedestrians and cyclists are more likely to be crossing or sharing the road space.

8.11 Public art can be sculptural, figurative, literal, or abstract, floor, mounted or set on a plinth. It can be built in stone or wrought from metal, engraved statements in paving or pictorial as a mural. Each medium has the potential to express and communicate important cultural and social concepts. It differs from the design language of other street furniture in that contemporary pieces are often seen successfully within more historic settings.

8.12 The National Planning Policy Framework states that planning policies and decisions should ensure that new streets are tree-lined and that opportunities are taken to incorporate trees elsewhere in developments. They provide habitats and biodiversity particularly in built up areas with increased recognition of benefits that the visual presence provides to mental wellbeing. Urban landscapes that incorporate trees have been shown to encourage walking whilst enhancing social cohesion and connectivity. Trees also soften the lines of buildings and are increasingly being recognised as an important tool in the challenge of climate change.

8.13 A tree strategy is particularly required in new developments where trees are not only seen as having a role in landscaping design, helping new buildings blend into existing areas, but absorbing water and reducing flood risk, filtering air pollution and mitigating climate change, as they play an important part in atmospheric carbon capture. Suitably positioned they can also help keep buildings sheltered and cool so reducing energy costs. The Woodland Trust recommends 30% of the site of a new development is given to trees.

8.14 In addition to the important role that trees play in terms of biodiversity net gain and carbon sequestration, they also make a vital contribution in terms of health and wellbeing. For trees to fulfil this potential and generate meaningful, healthy growth, the following criteria are important and need to be approved prior to installation:

8.14.1 the frequency in rows, avenues, and blocks;

8.14.2 their proximity to buildings, kerbs, and driveways;

8.14.3 the size at which it is planted;



8.14.4 the size and depth of the tree pit and the root barrier protection to avoid conflicts with existing services;

8.14.5 the quality of backfill material and the inclusion of ameliorants and permeable irrigation pipework;

8.14.6 the permeability of adjacent surfacing;

8.14.7 the robustness and style of the ground level grid and tree guard;

8.14.8 the initial maintenance regarding irrigation and feeding to achieve establishment and the longer-term maintenance to ensure growth is balanced and free from disease and dieback.

8.15 An inherent part of Cirencester's character is the use of indigenous limestone for buildings. This is the predominant material used throughout the town centre and its mellow appearance greatly enhances the public realm.

8.16 Intrinsic to these qualities and to help facilitate the free movement of pedestrians, is the removal and avoidance of unnecessary street clutter. This applies particularly to the use of free-standing structures which are designed to maximise their visual impact.

8.17 Illuminated and digital wall mounted and free standing signs distract from and commercialise the immediate environ. This is contrary to policies within existing legislation, the purpose of which are to protect the special character and appearance of buildings within Conservation Areas or the setting of Listed Buildings.

8.18 Cirencester has a wide range of different outdoor activities and events happening at any one time. It is therefore important to maintain and enhance this vitality through the protection of the public realm. Pedestrian routes and crossings need to be improved in accessibility, safety, and drainage. Any new development should encourage this and make footpaths wide enough for people to pass each other safely, where feasible. Introducing more seating throughout the town and achieving the correct balance between historic street surfaces and accessibility will help residents and visitors to discover and enjoy the heritage of Cirencester. Installation and maintenance of street trees and street furniture will be supported.

8.19 Specific areas that include proposals for improvements for example pedestrianisation in Cricklade Street and the Dyer Street area around Catalpa Square, will be supported. Whilst the alleyway between Dyer Street and The Waterloo [between Argos and The Salvation Army] has recently been enhanced it feels unsafe and is in poor repair compared to the Woolmarket. Improvements to Brewery Court will also be supported, including the courtyard with the mosaic which in the past has been neglected. There are also poor urban townscapes adjacent to car parks including the Forum and Sheep Street.

8.20 Cirencester has a good network of social and civic spaces. New development should help enhance and expand this network. This policy will apply to large residential and commercial proposals such as town centre redevelopment (see Policy TC1) which will be developed over the Neighbourhood Plan period. Such proposals will present appropriate opportunities to incorporate social and civic spaces within their layouts.

8.21 Known colloquially in Cirencester as 'bumping spaces', urban spaces that encourage spontaneous or unexpected positive social interactions, the urban street pattern of the town is generally connected, permeable and attractive. Castle Street, Black Jack Street and Coxwell Street are some of the best examples. This policy aims to maintain and enhance these qualities across the town and ensure that new developments take on the same positive attributes.

8.22 The areas of green space on the edge of the town centre are used for sport and recreation and should not be lost. Equally, the green spaces that are enclosed in the centre of Cirencester are vital 'breathing spaces' for the town and unique to the local character. These spaces have been designated as Local Green Spaces to ensure their long-term protection.

8.23 Cirencester has an important tourism economy but has no standardised town-wide welcome or signage strategy nor sufficient high-quality signage to the key heritage sites. Therefore, an improved and consistent signage strategy, including maps with directions to the cultural and heritage sites of Cirencester, is encouraged.

8.24 The term 'wayfinding' describes the processes people go through to find their way round an environment. The wayfinding process is fundamentally problem-solving and is affected by many factors such as people's perception of the environment, the information available, their ability to orientate themselves spatially and the cognitive and decision-making processes they go through. A system of signs, information boards, ground surface marking, and other interventions in the urban environment can greatly assist with the understanding of the town and the ability to navigate from place to place.

Cirencester Neighbourhood Plan
Submission Version

Part 2
Reg 16

cirencester
town council

Cirencester
Neighbourhood Plan



JANUARY 2026



09
THE 20 MINUTE NEIGHBOURHOOD

The 20 Minute Neighbourhood model of urban planning is about creating attractive, interesting, safe, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to the destinations that they visit and the services they need to use day to day such as shopping, school, community and healthcare facilities, places of work, green spaces, and more. This chapter describes the concept and explains how, through planning policy, it will be applied to Cirencester.

POLICY TMN1 – 20 MINUTE NEIGHBOURHOODS

Development proposals which in proportion to size and scale, support and extend the 20-minute neighbourhood model, will be supported where the following land use features are integrated or delivered:

a) diverse and affordable homes;

b) well-connected paths, streets, and spaces, with safe, direct, street level (at grade) cycle ways and footpaths;

c) key local daily facilities;

d) sports, well-being and community health facilities.

Proposals which enhance the provision of Key Local Daily Facilities across the Plan area will be supported, where they address a deficit shown by the Key Local Daily Facility Deficits Map or other evidence.

Planning applications which remove barriers to walking and cycling in residential neighbourhood areas and across the town will be supported.

CONCEPT AND BENEFITS

9.1 The Town and Country Planning Association (TCPA) says a 20 Minute Neighbourhood is about creating attractive, interesting, safe, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to the destinations that they visit and the services they need to use day to day such as shopping, school, community and healthcare facilities, places of work, green spaces, and more.

9.2 These places need to be easily accessible on foot, by cycle or public transport and accessible to everyone, whatever their budget or physical ability, without having to use a car.

9.3 The TCPA goes on to say that the 20 Minute Neighbourhood idea is also about strengthening local economies by keeping jobs and money local and facilitating local food production to create jobs and supply affordable healthy food for all, empowering communities to have a direct say in how their neighbourhoods change, and about doing all this in ways that create places that meet the needs of the least healthy and least well-off.

9.4 The report of the Director of Public Health 2021-22 'Sources of Strength – Securing Gloucestershire's Health and Wellbeing through an Anchor Institutions Approach' outlines how anchor institutions have a significant long-term stake in their local area. They have sizeable assets that can be used to support their local community's health and wellbeing and tackle health inequalities.

9.5 Interest in the 20 Minute Neighbourhood model to shape towns and cities is growing. The model has been adopted by cities and towns around the world. In Melbourne, Australia, it is a 'twenty-minute city', a 20-minute return walk being the time a Melburnian is prepared to walk from home to their destination. For Parisians, it is 15 minutes one way, that is an ambition to move to a model where residents are within a 15-minute walk of services. Closer to home, some London boroughs have adopted a 20-minute return walk.

9.6 Other towns such as Kendal focus more on a complete, compact, and connected place. Winchester has adopted 15-minutes one way from home to destination, that is a 30-minute town. The centre of Cirencester developed as, and largely remains, a 20-minute neighbourhood with what it offers within a short walk or cycle ride. Many areas on the periphery of the town are missing key local facilities. The Key Local Daily Facilities Deficit Plans within this chapter set out those areas of the town where key facilities are missing. Key Local Daily Facilities have been identified within this Plan as: a primary school, grocery shop, green space and public meeting place (Appx 02).

9.7 The TCPA, which has arranged seminars and produced reports on this subject, suggests a well-designed 20 Minute Neighbourhood features the following:

9.7.1 diverse and affordable homes;

9.7.2 well-connected paths, streets, and spaces;

9.7.3 schools at the heart of communities;

9.7.4 good green spaces in the right places;

9.7.5 local food production;

9.7.6 keeping jobs and money local;

9.7.7 community health and wellbeing facilities;

9.7.8 places for all ages.

9.8 The benefits of the 20 Minute Neighbourhood model, for example safe, sustainable, liveable communities with good access to jobs and essential services and effective integration of the outlying residential areas, were strongly supported during consultation and engagement.



MODEL INTO PRACTICE

9.9 While the 20 Minute Neighbourhood model is a straightforward concept, putting it into practice in an existing town is more complex and takes time. The plans for a 20 Minute Neighbourhood are based on community needs and not about following a generic model; it's based on a total 20-minute walk, to the key local facility and back.

9.10 This Plan promotes the 20 Minute Neighbourhood Model, and the benefits it brings across the whole of Cirencester. This will aim to ensure that the facilities residents use each day or frequently are within a short walk or cycle ride. All new development should be in accordance with the 20 Minute Neighbourhood model.

9.11 The Neighbourhood Plan promotes better connections and opportunities for safe, direct, street level walking and cycling. Importantly, it does not restrict how residents and visitors travel around, into and out of Cirencester. Everyone can continue to travel as they do now, if they choose and need to.

9.12 Through the policies of this Plan, new developments are expected to support and strengthen the 20 Minute Neighbourhood model by intelligent design and layout. The priority is to provide missing key local facilities and improve connections from residential properties to existing and proposed facilities.

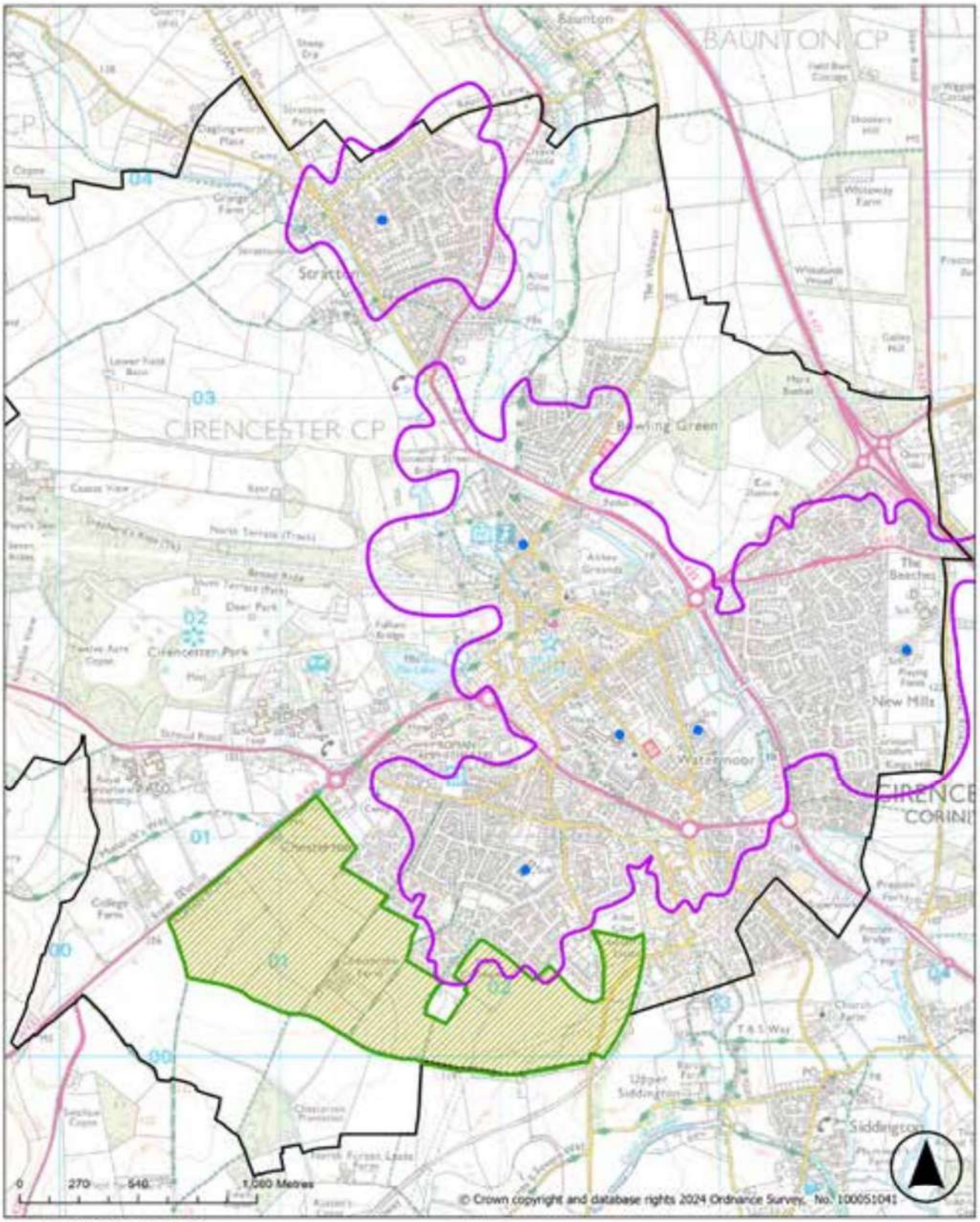
9.13 Other funding to support and strengthen the 20 Minute Neighbourhood model should also be actively sought and/or allocated by Cirencester Town Council and Cotswold District Council.

9.14 The theory behind the model, recognises that town centres play host to a range of services which are not used daily, but more infrequently, such as on a monthly or annual basis, for example hospitals and cultural facilities. It is unreasonable to expect such destinations that play a regional or sub-regional role to be a key feature in every 20 Minute Neighbourhood.

9.15 The town centre of Cirencester can rediscover its historic role as a commercial, community and cultural hub through the 20 Minute Neighbourhood model as a basis for future development.

9.16 The centre of Cirencester, developed as a walking neighbourhood already exhibits many of the recognized characteristics of a 20 Minute Neighbourhood. The challenge today is to overcome the barrier effect of local highway infrastructure through the provision of direct, safe, street level walking and cycling routes. This will extend the central walking neighbourhood bringing more homes within a 10-minute walk of frequently used key facilities and reconnect the centre to its surroundings to deliver the full benefits of the 20 Minute Neighbourhood model.

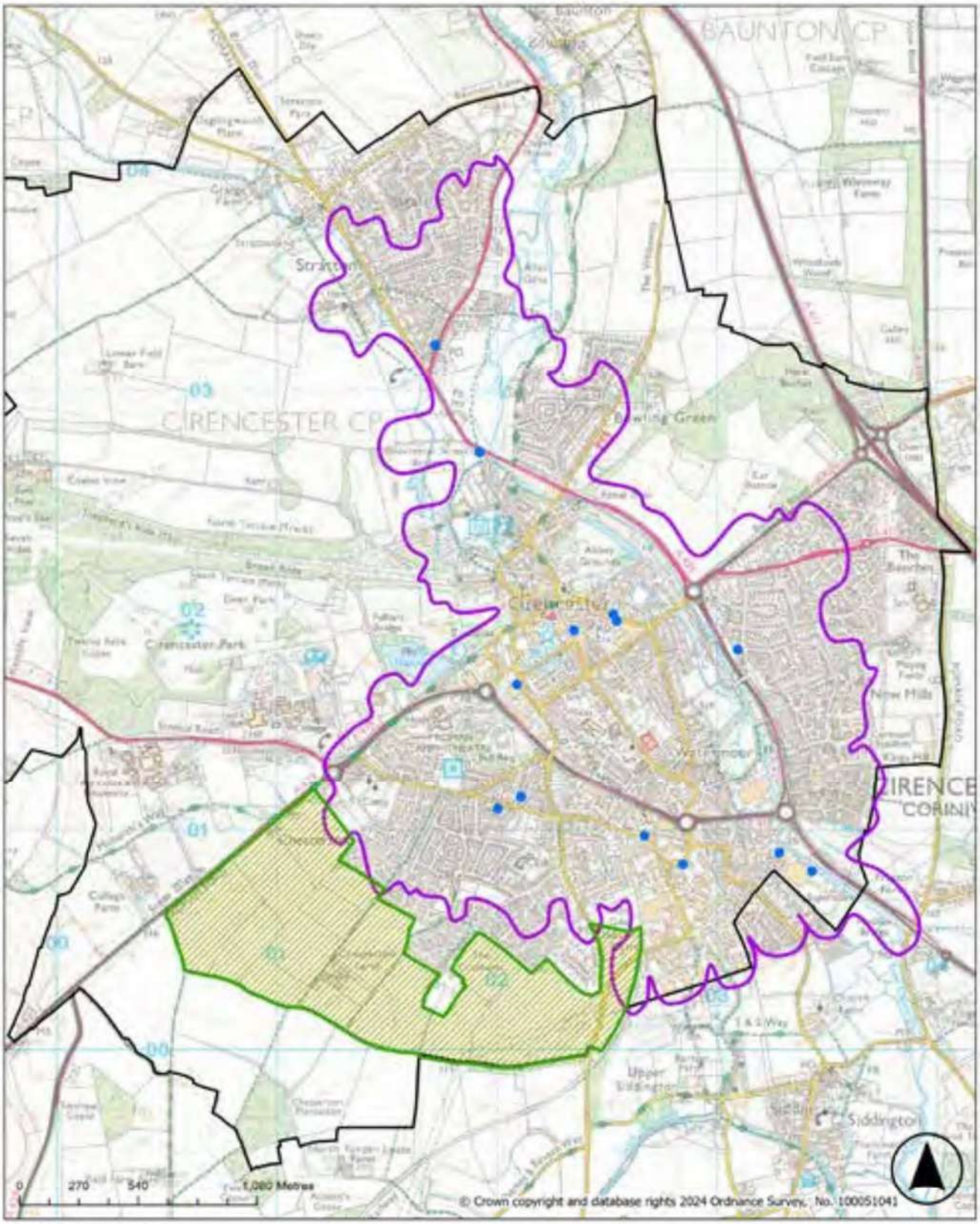
9.17 Most of the outlying residential neighbourhoods of Cirencester are not within a 10-minute walk of the town centre to enable everyday use. Improving the



PRIMARY SCHOOLS

Legend

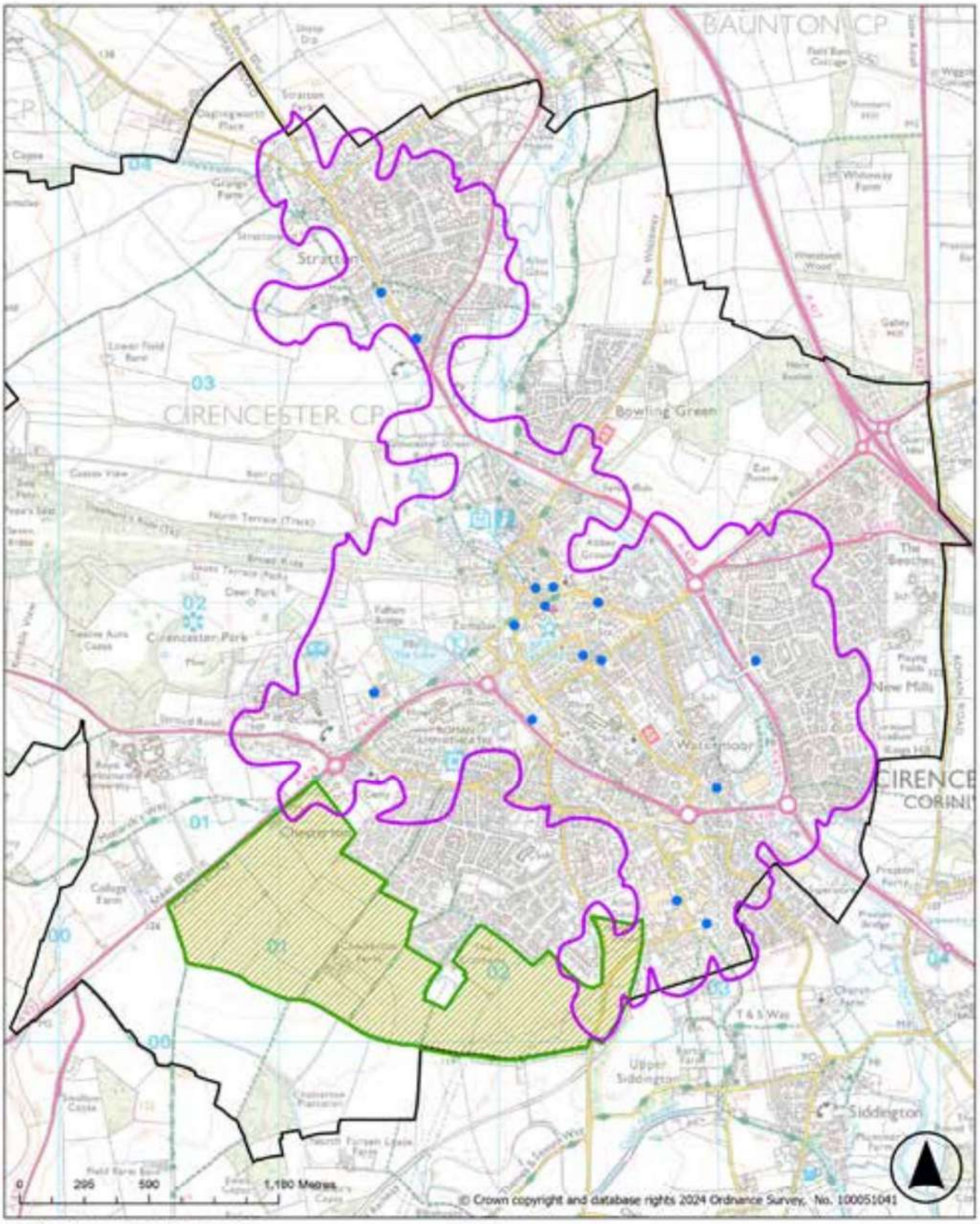
- Primary Schools
- Steadings Strategic Development site
- Area covered within a 10 minute walking speed of 5km per hour to a primary School
- Cirencester Parish



GROCERY SHOPS

Legend

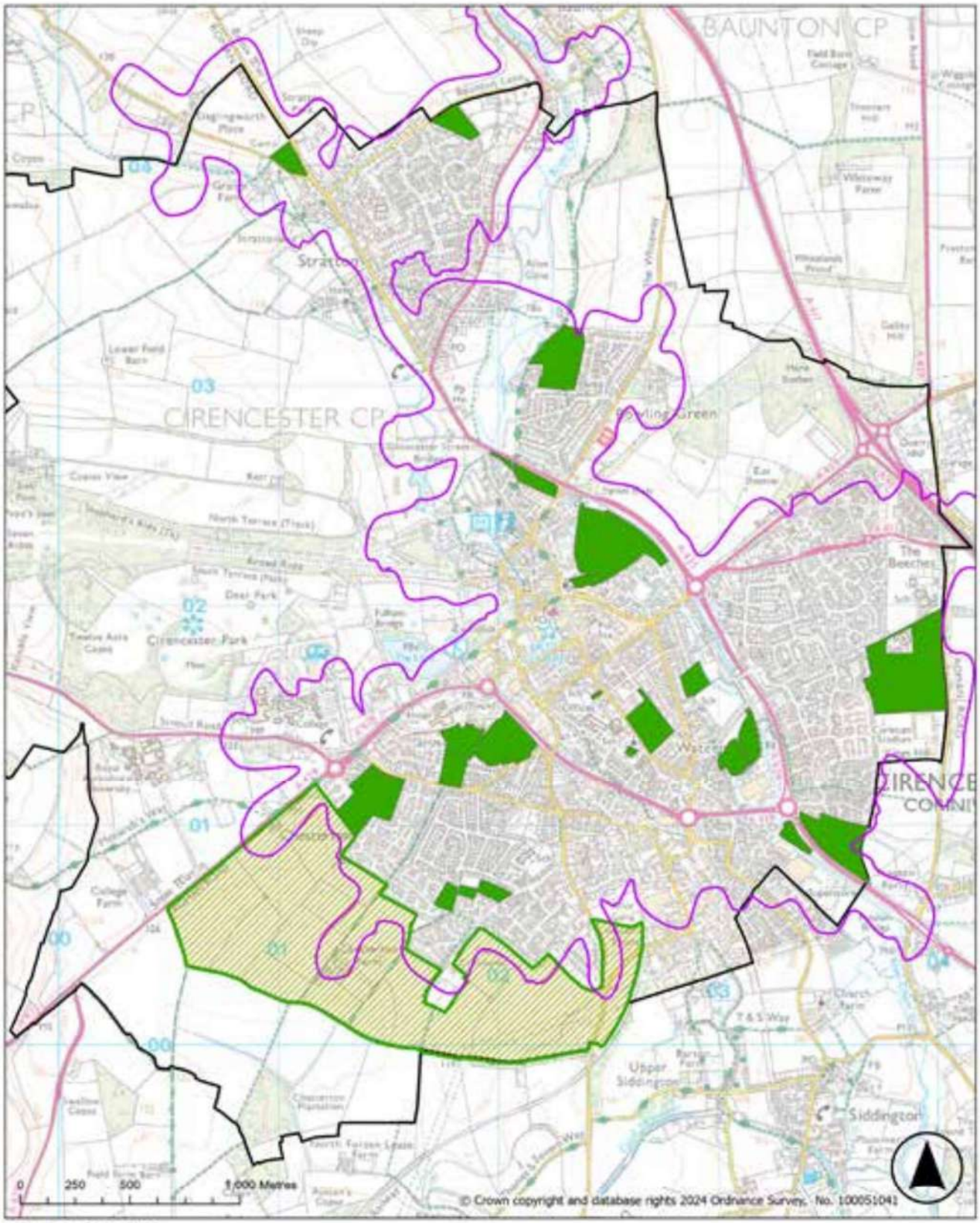
- Grocery Shops
- Steadings Strategic Development site
- Area covered within a 10 minute walking speed of 5km per hour to a Grocery Shop
- Cirencester Parish



PUBLIC MEETING PLACES

Legend

- Public Meeting Places
- Steadings Strategic Development site
- Area covered within a 10 minute walking speed of 5km per hour to a public meeting place
- Cirencester Parish



GREEN SPACES

Legend

- Green Spaces
- Steadings Strategic Development site
- Area covered within a 10 minute walking speed of 5km per hour to a green space
- Cirencester Parish

provision of key facilities used daily or frequently within residential neighbourhoods will provide residents with an alternative that can be reached within a 10-minute walk. These key local daily facilities have been identified within this Plan as: a primary school, grocery shop, green space and public meeting place (Appx 02).

9.18 This Plan promotes, strengthens and protects key facilities across residential neighbourhoods. Where such facilities are not within 10-minute walk new viable facilities should be provided and/or existing facilities better connected.

9.19 Ideally, a 20 Minute Neighbourhood should include the full range of Local Key Facilities and therefore policies to provide such facilities which are missing in a residential neighbourhood will be supported.

9.20 The 20 Minute Neighbourhood model integrates, and should be read in conjunction with the Plan chapters on 'Design and Built Environment' (diverse and affordable homes refers), 'Access and Movement' (well-connected, safe, direct and level paths, cycle ways and travel hierarchy refers) and 'Wellbeing and Community' (sports and community health facilities).

9.21 Provision of key local daily facilities is important for the quality of life in helping to create a sense of community and belonging. A neighbourhood lacking such facilities can have long-term financial and social costs as well as forcing residents to be car dependent. Providing such facilities in a timely manner, and where they are well integrated with development, is important to good planning.

9.22 Policies in this Plan include a requirement for new development to provide such facilities where they are missing, in the most convenient location; where existing facilities are at risk, the Assets of Community Value and Community Right to Bid legislation provides the local community with an opportunity to protect them. This is also covered under Chapter 12, Policy WBC4.

9.23 As part of the preparation of this Plan, an audit of existing key local daily facilities was carried out to ascertain which parts of the town are 'complete' 20 Minute Neighbourhoods and which have a deficit of key local daily facilities.

9.24 These facilities are categorised as follows (Appx 02):

9.24.1 primary schools, defined as state schools for primary education Years 1 to 7 which are non-selective;

9.24.2 grocery shops, defined as supermarkets, newsagents and convenience stores open throughout the day;

9.24.3 green spaces, defined as accessible to the public throughout the day including cemeteries, excluding permissive rights of way, open spaces which are chargeable to access, allotments and residential amenity land;

9.24.4 public meeting places, open during the day, defined as a pub or café.

9.25 The audit measured a walking distance of 800 metres from the identified key local daily facilities which allowed for a maximum journey time of 10 minutes from residential areas. This was based on a speed of 5km per hour (Source: British Heart Foundation), allowing for slower walking capacity, steep gradients and inclement weather. Walking journeys were measured using existing public footpaths and not measured on an 'as the crow flies' basis.

9.26 Using this information, deficits maps were produced to support the policies within this Chapter.

9.27 Good connectivity across the town allowing the population to walk and cycle from where they live to their daily needs is a key component of the policies which support and promote the 20 Minute Neighbourhood model.

9.28 Within Chapter 6 'Access and Movement', Policy AM1 includes the LCWIP, Gloucestershire County Council's Local Cycling and Walking Infrastructure Plan (LCWIP) for Cirencester which identifies 33 primary and secondary routes and 23 walking routes. Cirencester Town Council will work actively with Gloucestershire County Council and Cotswold District Council to strengthen, upgrade and create these routes within the town boundary where they improve the connectivity for residents in accessing key local daily facilities and where barriers are removed in accessing other vital services and facilities not used as frequently.



10 THE NATURAL ENVIRONMENT

Conservation of our natural environment has never been more important. The delicate balance of land, air, and water to provide the ecosystems that facilitate food production, carbon capture and wildlife habitats provide the natural capital that supports social, environmental, and economic benefits to humans.

POLICY NE1 – NATURAL AND SEMI-NATURAL HABITAT SCHEMES

Support will be given for the extension of natural and semi-natural habitat areas of the town, particularly on the periphery of green spaces, verges and edges of footpaths combined with the retention of hedgerows.

POLICY NE2 – WILDLIFE CORRIDORS

a) Development proposals should maintain the integrity of existing wildlife corridors whilst creating new opportunities to connect areas of habitat through planting and links.

b) Existing wildlife corridors within the town should not be separated or fragmented by changes to green infrastructure and habitats without justification and compensation with new connections.

POLICY NE3 – GREEN INFRASTRUCTURE PROTECTION & ENHANCEMENT

a) Development proposals should protect the existing green infrastructure of Cirencester and remove barriers to connectivity, creating new opportunities, connections, and extensions.

b) Green infrastructure opportunities and requirements, as defined by the Building with Nature Standards, should be considered at the earliest stages of all new development planning proposals, as an integral part of the town's provision, taking into account the most suitable locations and types.

c) The removal of existing green infrastructure within the town will be resisted and should be justified and compensated for, with appropriate replacement if permitted.

d) Development proposals will be resisted on designated biodiversity sites and core ecological networks as defined by the Gloucestershire Nature Recovery Network.



POLICY NE4 – LOCAL GREEN SPACE DESIGNATIONS

Local Green Spaces in Cirencester identified on the Map and scheduled in Table 2 will be protected from development except in very special circumstances.

POLICY NE5 – GREEN GAPS

Proposals that result in the loss of undeveloped land between Cirencester and its neighbouring parishes should compensate for this loss through appropriate replacement landscaped areas.

10.1 Conservation of our natural environment has never been more important. The delicate balance of land, air, and water to provide the ecosystems that facilitate food production, carbon capture and wildlife habitats provide the natural capital that supports social, environmental, and economic benefits to humans.

10.2 Cirencester is a town sitting on the fringes of the Cotswolds National Landscape (AONB), a Special Landscape Area (SLA) particularly rich in areas of natural habitat, alongside formal and informal recreational green spaces. Development over time has evolved around the vast private parkland of the Bathurst estate, the historic Abbey Grounds, and paths along the green and blue corridors, as they meander through and beyond the town.

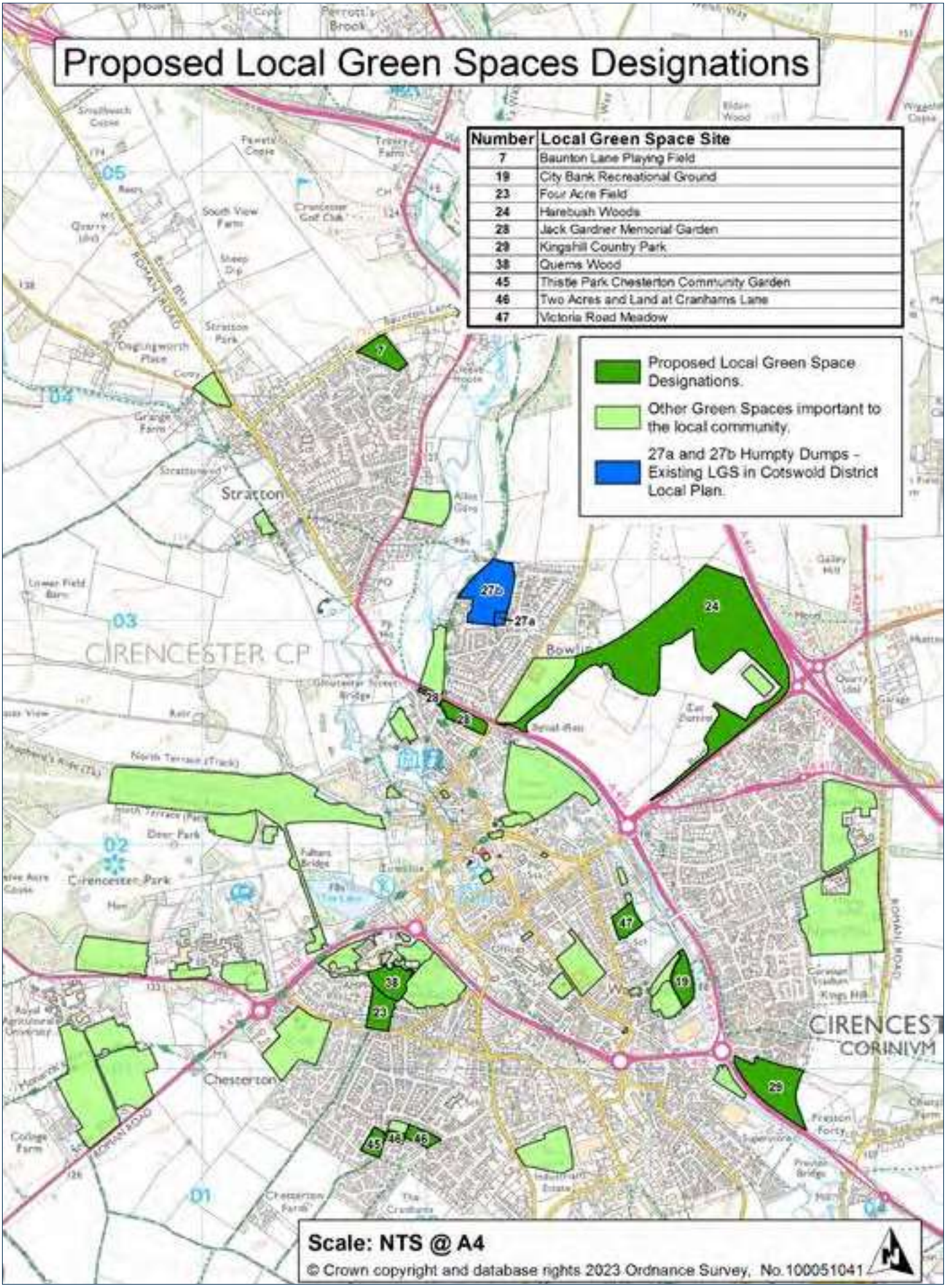

Proposed Local Green Spaces Designations
Number | Local Green Space Site
7 | Baunton Lane Playing Field
19 | City Bank Recreational Ground
23 | Four Acre Field
24 | Harebush Woods
28 | Jack Gardner Memorial Garden
29 | Kingshill Country Park
38 | Querns Wood
45 | Thistle Park Chesterton Community Garden
46 | Two Acres and Land at Cranhams Lane
47 | Victoria Road Meadow
Proposed Local Green Space Designations.
Other Green Spaces important to the local community.
27a and 27b Humpty Dumps - Existing LGS in Cotswold District Local Plan.
Stratton
CIRENCESTER CP
Cirencester Park
Chesterton
CIRENCEST
CORINIVM
Scale: NTS @ A4
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Table 2 – Local Green Spaces & Community Spaces

Proposed Local Green Space Designations							
Site Name & Reference Number		NPPF Criteria					
		Beauty	History	Tranquility	Wildlife	Recreation
7	Baunton Lane Playing Field				✓	✓
19	City Bank Recreational Ground		✓	✓	✓	✓
23	Four Acre Field			✓	✓	✓
24	Harebush Woods	✓		✓	✓	✓
28	Jack Gardner Memorial Garden	✓		✓		✓
29	Kingshill Country Park			✓	✓	✓
38	Querns Wood	✓		✓	✓	✓
45	Thistle Park Chesterton Community Garden				✓	✓
46	Two Acres and Land at Cranhams Lane			✓		✓
47	Victoria Road Meadow				✓	

10.3 Green gaps or buffers between Cirencester and nearby settlements have preserved the character and identity of the town. The woods of Querns and Harebush shelter small fragments of concentrated tree habitats whilst allotments and community gardens provide a place for residents' leisure. All of this contributes to the town's natural environment and beauty.

10.4 Growth requires the development of land but without strong planning policies can invade and compromise existing habitats and biodiversity, reduce carbon capture and potentially increase the impact of flood events.

10.5 Recognising the contribution this natural capital makes to wellbeing, sustainability and resources featured highly in the Neighbourhood Plan community engagement with 65% of respondents in the 2020 online survey stating protection of the Natural Environment was important.

10.6 Residents appreciate and want to protect the recreational and green open spaces but also value the informal nature of City Bank, the extension of habitats through wilding on the edges of Four Acre Field and the wildlife observed when walking along the River Churn, all of which add to the town's character and natural beauty.

10.7 There is also recognition that increasing summer temperatures will need better urban shade, and through the pandemic lockdown, a realisation of the positive mental health benefits of spending time in green spaces immersed in nature.

10.8 The 2021 flooding events in the town heightened the need for stronger water management strategies to deal with not only sudden heavy rainfall but rising ground water. Flood plains must be protected, river management maintained and improved with policies that resist, reduce, or limit the water capacity of the land or run off.

10.9 The National Planning Policy Framework paragraph 109 states that the planning system should contribute to, and enhance, the natural environment.

10.10 The environmental planning policies EN1 through EN9 within the adopted CDC Local Plan support this statement but the Neighbourhood Plan has an opportunity to strengthen and better protect the natural environment within planning policies, areas identified by stakeholders and the community.

10.11 Cotswold District Council declared an Ecological Emergency in 2020, putting ecology at the heart of climate emergency action. The Neighbourhood Plan Community Survey of 2019 and public engagement of 2021 both confirmed respondents highly valued the biodiversity value of areas of the town, whether within the parks and designated green spaces or informally as seen with recent wilding schemes. The Neighbourhood Plan can work alongside emerging policy and planting schemes to support recovery and extend this work.

10.12 The Government's 25-year Environment Plan defines biodiversity as the variety of ecosystems or habitats that can and do exist and the genetic diversity they contain. Apart from the support of lifecycles, such ecosystems also provide carbon capture that contribute to mitigating climate change, optimizing natural pest management, protecting threatened species such as bees and replenishing the land with nutrients (cross refer with Section 41 of the Natural Environment and Rural Communities (NERC) Act and the published list of habitats and species of principal importance in England).

10.13 The introduction of the 2021 Environment Act will now require all qualifying developments to deliver a minimum biodiversity net gain of 10% which should then be shown to be maintained for a period of at least 30 years. The use of the DEFRA (Department for Environment, Food and Rural Affairs) published Statutory Biodiversity Metric to assess the baseline and improvement recognises the potential negative impacts on habitats arising from developments and calculates how much new or restored habitat, and of what types is required to deliver sufficient net gain.

10.14 The RSPB (Royal Society for the Protection of Birds) has shown a 41% decline in bird species populations during the last fifty years particularly the house sparrow, starlings, and skylarks with one of the most significant drivers being urbanisation and the decline in the habitats that support their lifecycles. Other wildlife in decline includes a 95% reduction in hedgehogs and 68% loss of the common toad since the 1950s.

10.15 There is a critical need to maintain and enhance these delicate balances long term and stop further decline with the threats from pollution, development, and invasive species. Research has indicated a target of 90% biodiversity within a land mass is needed to avoid wildlife extinction and the sustainability of food production, the UK currently has 50% remaining, the lowest of any G7 nation (Source: Natural History Museum).

10.16 Alongside this, areas of wildlife habitat are known to contribute to wellbeing and health, especially during times such as the recent pandemic when lockdown reportedly escalated people's awareness of the benefits of the natural environment. A Natural England survey of 2020 stated many adults felt happier in nature and they were worried about its loss.

10.17 At a national level the National Planning Policy Framework paragraphs 109-119 currently state planning should contribute to, and enhance, the natural and local environment by minimising the impact on biodiversity including establishing coherent ecological networks that are resistant to current and future pressures.

10.18 Cirencester has a rich natural landscape of biodiversity supported by the urban street trees and vegetation of the river corridor which supports insects and amphibians. In recent years there has been wilding of the boundaries of open areas such as Cirencester College, the wildlife meadows of Victoria Road and along the paths and margins of Four Acre Field.

10.19 Existing biodiversity must be protected, maintained, enhanced and extended where possible and could be replicated in development in place of plain grassed areas or with wilding along the edges of play spaces.

10.20 This habitat-based approach supports foraging and life cycles and as such excludes items such as bird and bat boxes. Natural England considers this the most important strategy for determining current ecological value versus net gain. Ecological reports would then need to be consistent with BS 42020 Biodiversity code of practice for planning and development.

10.21 In conjunction with the emerging Local Nature Recovery Strategy, green infrastructure and biodiversity net gain, new developments should contribute towards the enhancement of green spaces and green corridors within the town for biodiversity and people as identified within the Cirencester Neighbourhood Plan (cross refer with the Gloucestershire Nature Recovery Network and mapping at www.naturalcapital.gcerdata.com).

10.22 The inclusion of biodiversity policies within the Neighbourhood Plan therefore seeks to further strengthen in development a requirement to protect, extend and enhance biodiversity, supporting the new net gain requirement and reflects the importance placed on biodiversity as a feature of the local environment by residents.

10.23 Key biodiversity principles which should be considered in development are:

10.23.1 the greater use of natural features such as trees and hedgerows with potential extensions such as green roofs and water bodies such as ponds in new development;

10.23.2 native and diverse enhancement projects to support nature's recovery, sympathetic to the site and using naturalised pollinator friendly species;

10.23.3 best practice landscaping;

10.23.4 linked and connected habitats and biodiversity planting;

10.23.5 wilding of green spaces currently predominately grass;

10.23.6 best practice in maintaining verges and hedgerows.

10.24 The benefit will be the protection and extension of the current biodiversity combined with a requirement development achieves the 10% net gain, avoid fragmentation, and only use native planting.

10.25 A wildlife corridor links the habitats and spaces that facilitate the maintenance of ecological processes that include movement, feeding, and breeding.

10.26 While encouraging and enhancing biodiversity within the town is desirable, isolated wildlife habitats and ecosystems are stressed and less robust with reduced chance of survival. Links between habitats that allow wildlife to move freely are essential, for example, gaps in boundary walls and under fences to allow hedgehogs to move between gardens to shelter or dark corridors for bats to forage (cross refer with the Gloucestershire Wild Towns report published by the Gloucestershire Wildlife Trust and Cotswold District Council's Green Infrastructure Strategy).

10.27 In the education quarter, for example, the Wild Campus Cirencester Project has created and extended wildlife corridors to provide safer passage for endangered species between Cirencester Park and the farmland towards Coates. Active management and enhancement of these habitat connections are essential.

10.28 The NPPF states development should seek to identify and map habitat networks particularly if proposals could fragment or interrupt a landscape corridor and isolate species while the Environment Act of 2021 requires the need to protect these nature recovery networks.

10.29 Cirencester has many areas that currently link together to essentially form wildlife corridors, all of which mingle and merge to support the extensive local network of species and wildlife activity. These are important landscape features and amenity spaces, to be maintained and enhanced through linkage and extension.

10.30 Wildlife corridors provide recreational and relaxation spaces important for mental and physical wellbeing, contributing to the character of the town and educating on the delicate interaction between humans and the natural world, whilst providing routes for wildlife to migrate.

10.31 The Neighbourhood Plan aims to maximise all green and water course wildlife corridors by strengthening and supporting the adopted Local Plan Policy EN8 that proposals affecting significant habitat fragmentation should not be permitted while using developer contributions for the reversal of any existing fragmentation.

10.32 Development should maintain the nocturnal integrity of all corridors through the avoidance of new and extended light pollution where darkness is an existing characteristic.

10.33 The planting of additional native species trees and new hedgerows will be encouraged and supported in development which connect to existing wildlife corridors. New footpaths and access points into developments must have native and appropriate linked boundary planting (cross refer with species records from the Gloucestershire Centre for Environmental Records (GCER) to inform landscaping proposals).

10.34 The benefit of this approach will be the protection and extension of wildlife corridors in development or within the town, correcting existing and avoiding new fragmentation whilst using only native planting.

10.35 The key objectives within the town are:

10.35.1 to protect the important natural corridors for people and wildlife to move easily between open spaces or along water courses within the town and beyond without breaks;

10.35.2 to identify and support opportunities for enhancements and connection of missing or fragmented areas to the existing network through features such as bridges, raised fences or natural boundaries, particularly on the side of footpaths and open spaces;

10.35.3 to maintain the visual integrity and amenity value of all wildlife corridors;

10.35.4 to enhance connectivity for priority species, such as hedgehogs through the creation of gaps in boundary walls and under fences.

10.36 Green infrastructure includes all the spaces and assets that provide environmental and leisure benefits within an area such as parks and playing fields, woodlands, allotments, gardens, and water courses. Alongside these are incidental natural areas and features such as meadows, hedgerows, and verges and all these individual spaces create a green infrastructure network with benefits for all. It is this natural capital identified by the NPPF 2021 as capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities.

10.37 For towns such as Cirencester these include:

10.37.1 wellbeing through access to outdoor recreational spaces for social interaction and sport, urban ambience, and tranquility;

10.37.2 enhanced and better ecological resilience;

10.37.3 wildlife habitat connectivity;

10.37.4 food production in allotments and community gardens;

10.37.5 urban cooling;

10.37.6 management of flood risk and water absorption;

10.37.7 reduction in climate impact through carbon storage;

10.37.8 filtering pollutants;

10.37.9 attractive roads and paths;

10.37.10 town character and quality of the public realm urban greenery;

10.37.11 verges that soften highways.

10.38 The UK Government 25-year Environment Plan focuses on enhancing the natural capital of the country, and the town's urban green infrastructure underpins this vision. The pandemic heightened appreciation and awareness of the 'natural' over the 'built' environment of the town, allowing social connections at a time of lockdown and stress, and raising in engagement the desire to protect for future generations.

1039 In addition to the City Bank Local Nature Reserve (LNR), which is a statutory designation of the site by Natural England for people and wildlife under Section 21 of the National Parks and Access to the Countryside Act 1949, the green infrastructure of Cirencester contributes to the quality and distinctiveness of the town. From the private Bathurst estate open to residents for recreational use and public parks such as St Michael's and the Abbey Grounds with its lake and much appreciated bevy of swans, the historic Amphitheatre and Querns



Wood, City Bank Nature Reserve alongside the many formal and informal recreational fields and parks. Aside from recreation, green infrastructure contributes to local food production, active travel connections, fitness, and education.

10.40 Verges also act as a visual buffer between roads, paths, and buildings and within Cirencester can be the remnants of old meadows bounded by species-rich hedgerows with refuges for wildlife whilst acting as corridors connecting species and habitats across the town. They are particularly important during the spring and summer when a huge range of wildflowers and grasses provide a rich habitat for wildlife including insects, spiders, snails, small mammals, and birds.

10.41 While management of verges within the public highway is the responsibility of Gloucestershire Highways, who have adopted a mid- summer cutting strategy to facilitate biodiversity gain, their removal or encroachment by households or commercial premises extending car access to the road should be avoided without strong justification.

10.42 Cotswold District Council's Green Infrastructure Strategy identifies key themes and aims for development, but the Neighbourhood Plan takes this further. The benefit will be the protection, maintenance, and extension of the current and potential green infrastructure within Cirencester, its contribution to wildlife, wellbeing, and landscape.

10.43 The key requirements will include:

10.43.1 development proposals must contain within the planning application material proposals for new sustainable long-term green infrastructure such as green open spaces, its management and maintenance;

10.43.2 avoid any removal of green infrastructure within the town without justification or replacement;

10.43.3 urban ambience and tranquility to be better recognised as a benefit of retaining and enhancing green infrastructure and support will be given for an 'urban tranquility strategy' for Cirencester.

10.44 Cirencester has become more vulnerable to flooding in recent years. The valley location and high groundwater levels have always been factors but significantly increased run-off, declining river management, old sewers with inadequate capacity and more extreme weather have made things worse. With increased development and climate change, the risks will grow. The town should develop a water management strategy that addresses all the contributory factors of flood events including river management, sewer capacity and the use of flood wardens.

10.45 The local river system drains the Cotswold Hills north of the town and flows south to the Thames. At Barton Mill part of the River Churn is joined by the Dunt or Duntisborne Stream and feeds the Gumstool Brook which returns via culverts to the part of the Churn which feeds the lake in the Abbey Grounds. Other culverts, some Roman in origin, also carry water under the town. The main Churn course runs east of the Abbey Grounds and is re-joined by the rest beyond Watermoor.

10.46 The river used to be actively managed by the ancient water meadows upriver towards Baunton and Stratton and the mills around Cirencester, but this no longer happens. To the south, meadows at Watermoor and Kingsmeadow have been built on, creating areas of flood vulnerability.

10.47 A complex range of factors are responsible and differ in their impact in each locality. For example, the Churn being overwhelmed by highway runoff above Spitalgate while in Chesterton lack of capacity in foul water sewers is key.

10.48 Problems are associated with high volumes of water coming down river after prolonged heavy rain. Changes in agricultural practice in the catchment area make this more likely and the situation is worsened by rapid run off in the town due to increased hard surface area and the inability of storm drains and sewers to cope.

10.49 Another risk factor is the lake in Cirencester Park which last overflowed following storms in 2007. Climate change models suggest future increases of between 15% and 30% in rainfall intensity which will magnify risk in urban areas. The sewer system is already beyond its intended capacity and any additional hard surfaces will increase the pressure.

10.50 A range of measures are already being taken to alleviate flooding and increase resilience including sewer replacement and an overflow area at Barton Mills, but others will require funding. These could potentially involve work to use the water meadows as a flood reservoir and work in the upper reaches of the Churn to reduce the speed of run off by creating wetlands, planting hedges and deep-rooted plants and building wooden dams. River restoration projects have been shown to reduce flooding including restoration of banks and meanders.



10.51 The inadequacy of the current sewer system means that during storms raw sewage is pumped into the river to continue to provide waste-water services to homes.

10.52 Even in good weather, the town is at capacity with water treatment, Shorncote sewage works already serves a population of 34,000.

10.53 New developments should provide additional sewer capacity their building will require, including increasing treatment capacity and incorporate design features to reduce storm run-off. These might include blue roofs, SuDS (Sustainable Drainage System), ponds, and ditches. Where possible, hard external surfaces should be permeable, including new driveways.

10.54 However, for much of Cirencester, ground water levels are too high for soak-aways to be effective and other measures should be used. Additionally, development should not take place on flood meadows and should leave an 8m buffer strip to allow for additional capacity.

10.55 Aside from sewage and other pollution, Cirencester's waterways also suffer from drying up during the summer months. As a result, the diversity of wildlife has declined.



10.56 During the last decade the Gumstool Brook has lost its population of water voles while numbers of fish have declined. Some of this is due to abstraction by Thames Water but leakage and rapid run off also contribute. Many of the natural measures to reduce flooding will also keep our waterways running all year and bring back wildlife.

10.57 The Neighbourhood Plan looks to strengthen water management in development with the key requirements to:

10.57.1 incorporate into new developments water mitigation strategies such as run offs and SuDS;

10.57.2 consultation on improvements to river management of the Churn and support for a town flood strategy and better river management with the restoration of banks;

10.57.3 households to be encouraged to avoid further hard landscaping of front gardens to retain water run-off and be encouraged to use permeable paving where appropriate.

10.58 The benefit of these measures will be to strengthen the towns resilience to heavy rainfall, its consequence, damage, and cost with the requirement that new residential developments must integrate features to accommodate future events.

10.59 Cirencester has a network of green and open spaces that the community use for recreation, social interaction, and rest. They also create physical breaks within the built environment, urban structures, roads, and walkways. Some already benefit from protective policies and others are informal open areas or part of the urban environment. See map on page 82.

10.60 The private Bathurst Estate parkland dominates the town with its richness of recreational green space, and whilst it has restricted public access is included for the extensive relationship between its use and town life with extensive pathways and connections to the town through and within. Access for individuals and families with a Community Pass, Day Pass or Annual Pass to Cirencester Park is valued and enjoyed by residents and visitors to the town.



10.61 Alongside this sits other areas such as the protected historic Abbey Grounds, St Michael's Park with its tennis courts and play areas with smaller pockets of open space such as the Four Acres field in Chesterton.

10.62 Smaller green spaces such as those within housing estates can also be just as valued by the community who live within the immediate vicinity, and as such are equally recognised.

10.63 Open spaces that may be predominately hard landscaped with small areas of urban greenery include recent seating at the end of Watermoor Road, developed by the local community with informal planting.

10.64 These spaces are unique and contribute to the local character of the town and are places of wellbeing, socialising, and recreation. Less obviously, these spaces include cemeteries, often maintained by volunteers which offer places for reflection, such as the quiet garden at the Quaker Meeting House.

10.65 Local green spaces designated within the Cirencester NDP will be protected from development except where there is an existing building/structure within the space and the works are needed to maintain its viability/use into the future (e.g. a sports pavilion); or where the proposed development will be for the benefit of the community and will preserve the particular local significance of the space for which it was designated.

10.66 Essential small scale utility infrastructure will be supported where the existing use and community value of the space is not detrimentally affected. Proposals for the development of new green infrastructure to assist with flood protection and/or to contribute towards public enjoyment and health, and/or to create corridors for wildlife will be supported.

10.67 The National Planning Policy Framework introduced Local Green Space designation to provide special protection against development for green areas of importance to communities and to ensure their permanence and quality.

10.68 The designation can be used where:

10.68.1 the green space is in reasonable proximity to the community it serves;



10.68.2 the green area is demonstrably special to a local community and holds a local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife;

10.68.3 the green area is local in character and is not an extensive tract of land.

10.69 Designated local green spaces do not have to be publicly accessible, and do not need to be in public ownership. The Cirencester NDP Steering Group, acting on behalf of Cirencester Town Council, has identified 10 sites that it believes are worthy of designation as Local Green Spaces, these 10 sites have been described and mapped in Appendix 03.

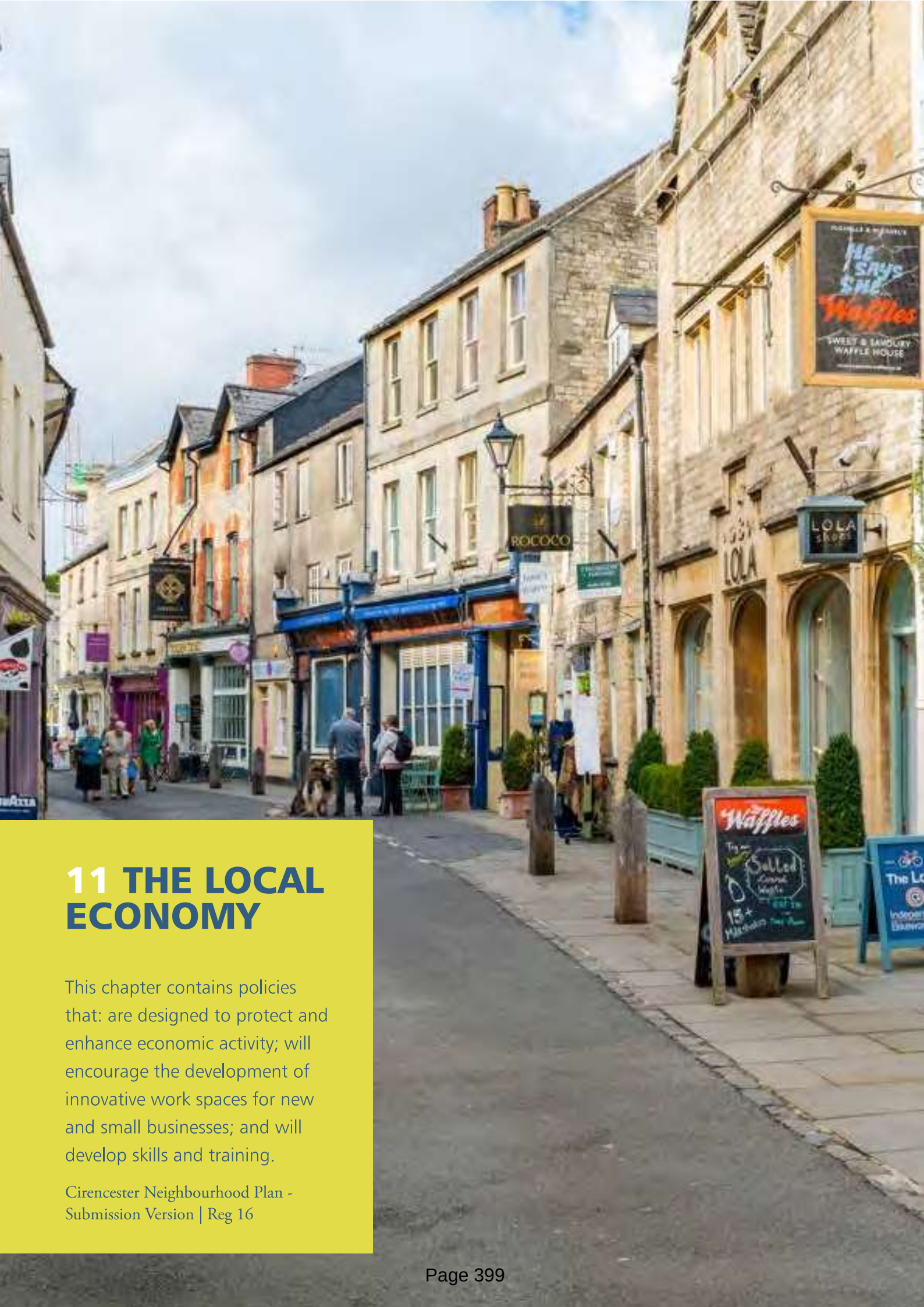
10.70 Cirencester is growing significantly and the green gaps that define its boundaries and prevent coalescence with its nearby settlements are increasingly under threat. Even small peripheral developments can lead to urban sprawl and diluted distinction of communities. A community aspiration is that development proposals should maintain the distinction between adjacent settlements and Cirencester by maintaining existing green gaps and/or creating new landscaped areas.

10.71 The town's relationship with its surrounding landscape was a key feature of community engagement in 2021, a reason many like living in the town.

10.72 As Cirencester expands, encroachment compromises the distinct nature of the town and should be supported by a strategy to avoid diluting the landscape character and identity. It also preserves the distinct identities of the nearby communities of Siddington and particularly Preston, where the green buffer is small.

10.73 Therefore, developers must show through appropriate landscape visual impact assessment that any planning proposals would not diminish the visual distinction between the town and nearby settlements, nor compromise approaching gateways into the town.

10.74 The benefit will be the retention of the distinct settlement character of Cirencester from its neighbours, avoiding urban sprawl and prioritising less sensitive development land.



11 THE LOCAL ECONOMY

This chapter contains policies that: are designed to protect and enhance economic activity; will encourage the development of innovative work spaces for new and small businesses; and will develop skills and training.

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POLICY LE1 – PROTECT & ENHANCE ECONOMIC ACTIVITY

a) In so far as planning permission is required, existing economic activity (including employment, tourism, and retail uses) and premises across the town centre will be protected and enhanced.

b) In so far as planning permission is required, existing economic activity in the neighbourhoods, particularly key local daily facilities identified as community assets within Appendix 2 and associated information, will be protected, and enhanced.

c) Subject to permitted development rights, any loss of employment uses, or premises, will not be supported unless it is accompanied by clear evidence demonstrating that the site or premises has been actively marketed for employment use and is not currently viable.

d) Introduction of new low carbon economic uses and activities will be encouraged.

POLICY LE2 – PROVISION FOR INNOVATIVE WORK SPACES, NEW & SMALL BUSINESSES

a) Development proposals that provide innovative hybrid and/or mixed-use working spaces which encourage creative small businesses or community uses will be supported.

b) Support will be given for developments on sites that provide accommodation for start-up businesses by enabling low-cost facilities in cooperative clusters and microbusinesses.

POLICY LE3 – SKILLS DEVELOPMENT

a) Development proposals will be supported where they provide opportunities for training, the obtaining of skills, and education.

b) Proposals that provide enhancements to existing skills and training facilities will be supported, including the encouragement of local apprenticeships, T-Level and other work related placements.

POLICY LE4 – NEW EMPLOYMENT PREMISES & DESIGN QUALITY

a) Proposals for new employment development outside existing industrial and employment areas should through its design, scale, and materials provide an attractive business environment which takes account of the character and appearance of Cirencester.

b) New employment and industrial proposals should demonstrate through a Design & Access Statement how they respect the character and appearance of the neighbourhood area. Where their scale and location provides practical opportunities to do so, development proposals will be supported where they provide clear and convenient connections with the town centre and create public access to the surrounding areas.

11.1 Cirencester residents want a vibrant town centre and are concerned about the loss of shops and pubs. There is also a desire for a larger evening-economy.

11.2 Hospitality and tourism are important to Cirencester. There is potential for growth and to be more of a year-round destination linked to heritage and proximity to the Cotswold Lakes (formerly the Cotswold Water Park) but also a desire for tourism to be manageable and sustainable, which requires the preparation of a sustainable tourism strategy.

11.3 In respect of recruitment and employment surveys, conducted by GFirst LEP and Business West, show that local employers struggle to recruit staff at all levels. Meeting these needs goes beyond the scope of this Plan although transport and affordable housing have crucial roles to play particularly in retaining more of our young people. Census data shows lower than average proportions of 21 to 30-year olds, living in Cirencester. Improving skills for young people but also those changing careers or re-entering the job market is important.

11.4 Attracting more high skill companies, particularly in digital, green technology, and agri-tech is key to Gloucestershire's strategy to be a magnet county that keeps and attracts young people. Maintaining a strong local tradition of innovation and start-ups is also part of this and together, will ensure a strong tax-base and growth in local spend.



11.5 Successful delivery of this strategy means ensuring we have the right kind of communication infrastructure and employment space available whether that is co-working hubs, small retail start-up units or more flexible space on industrial estates.

11.6 Employment land is designated within The Steadings development and proposed Innovation Village on University land as well as pockets in the town centre. If local people are to benefit from future industries, it means we need to have the right kind of skills training provided locally. Employers should be encouraged to take on apprentices and provide the T Level placements that students need to acquire and develop workplace skills alongside gaining vocational qualifications.

11.7 Innovative use of new employment space within the town centre is required, including redevelopment, to attract high-value business and enable new start-ups; ensuring that infrastructure is in place to support them.

11.8 Cirencester does not have a high profile in economic plans at County and District level, so it's important that local authorities responsible for the town ensure its interests are promoted effectively. This includes early engagement with organisations providing capital funding for infrastructure and the Local Skills Improvement Plan (LSIP) for skills development.

11.9 Key assets identified by GFirst LEP including Farm491, the Growth Hub and Gloucestershire

Digital Skills Centre should be supported. The public transport infrastructure priorities identified in the Access and Movement section will also be important to our local economy.

11.10 Developing an economic voice for Cirencester will be vital. This voice will promote the historic centre but also enhance local economic links, ensure a thriving town centre, and secure enabling infrastructure investment.

11.11 The key outputs of this voice will include:

11.11.1 developing a Sustainable Tourism Strategy which exploits the town's historic and archaeological assets and provides increased access to and information about sites such as the Amphitheatre, to enhance the visitor economy and the town's 'brand';

11.11.2 actively seeking to attract businesses which provide career opportunities for local people with priority given to high value, digital, STEAM (science, technology, engineering, the arts and mathematics), agri-tech and finance businesses;

11.11.3 actively lobbying for infrastructure investment to underpin the future economy of the town;

11.11.4 articulating and developing links between the town, Cotswold Lakes and the Cotswolds National Landscape (AONB) to enhance Cirencester as an all-weather, all-year destination;

11.11.5 to encourage an enhanced, but managed and sensitively located, evening and night-time economy;

11.11.6 creating a Town Centre Business Development Manager post to coordinate and seek funding for measures to sustain and enhance the vitality of the economy.

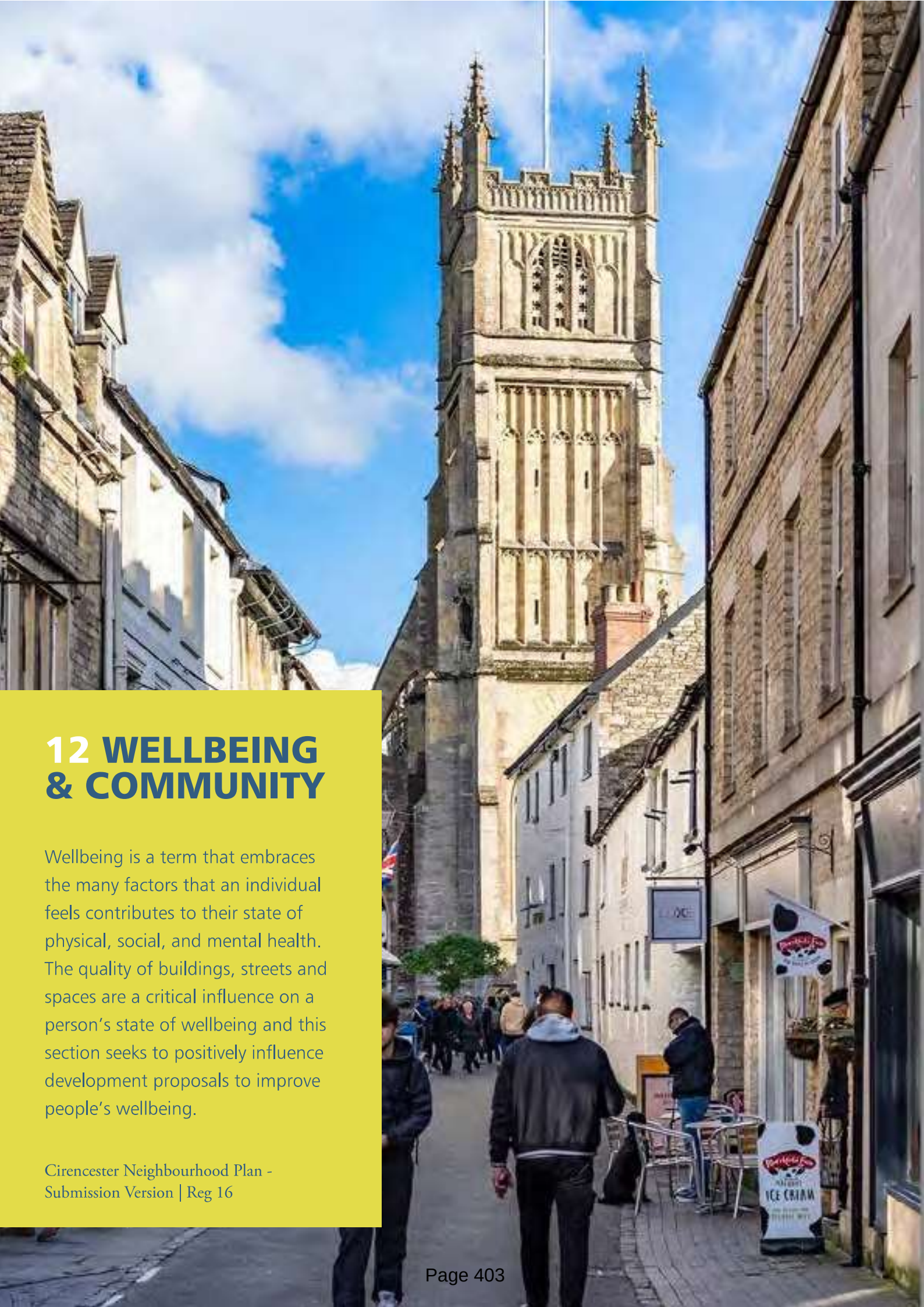
11.12 Plans and policies are needed to ensure the vitality of the town centre with proactive measures to support business, retail and hospitality.

11.13 Proposals that protect and enhance economic activity across the town centre will be supported. This includes proposals that introduce active street level uses, such as retail employment, leisure, food/drink, commercial use, social spaces, and entrepreneurial activity.

11.14 Town centres are at the heart of communities, providing accessible shops and services, employment, and leisure facilities. Vital and viable centres not only provide economic and social benefits but also help to foster civic pride, promote local identity, and contribute towards the aims of sustainable development. The dispersal of commercial activities to out of town locations will not be supported to protect the vitality of the town centre.

11.15 Innovative new models of economic activity, such as hybrid or mixed- use spaces that support start-ups, co-working, and community activity will be supported across Cirencester.

11.16 Increasingly, the changes to town centres and high streets have resulted in them needing to be adapted and redefined to support a greater diversification of uses and bring back active street level uses, as the retail dominant function diminishes.



12 WELLBEING & COMMUNITY

Wellbeing is a term that embraces the many factors that an individual feels contributes to their state of physical, social, and mental health. The quality of buildings, streets and spaces are a critical influence on a person's state of wellbeing and this section seeks to positively influence development proposals to improve people's wellbeing.

POLICY WBC1 – AIR QUALITY

a) Developments that encourage idling traffic, such as drive-through food outlets, within the Plan area will not be supported.

b) Developers will be required to monitor air quality, including particulates, to ensure that an Air Quality Neutral standard is achieved throughout site development for building and construction traffic emissions, and if necessary, to instigate mitigation.

c) Development proposals should be operationally designed in a way that minimises any impact on public health through emissions and dust.

POLICY WBC 2 – EQUAL ACCESS TO PUBLIC OPEN SPACES FOR ALL

a) Development proposals should accommodate the needs of all users, including those with mobility needs, in the design and landscaping of public open spaces.

b) Access to new and existing public open spaces should be provided through well-connected paths of appropriate widths, smooth non-slip surfaces, and navigation aids such as signs.

POLICY WBC 3 – ACCESS TO PLAY SPACES

a) Developments of greater than 10 houses should provide or enhance nearby play spaces for the site size, easily accessible to all users.

b) Provision of new publicly accessible play spaces should be maintained by the Town Council or a local community management trust.

c) The development of new fitness trails and outdoor gyms in open green spaces, where appropriate, will be supported, especially those that connect to the cycling 'spoke and wheel' network of the town.

POLICY WBC 4 – COMMUNITY FACILITIES

a) The loss of existing community buildings (Use Class D1) will not be supported unless it can be demonstrated that the facility is no longer viable.

b) Flexible multi-functional spaces that allow for the widest possible use and activity, particularly daily community needs which are missing, will be supported.

POLICY WBC 5 – DESIGNING OUT CRIME

a) Development plans should demonstrate in the design and access statement how principles that deter crime have been incorporated.

b) Support will be given for the development of upper floor empty town centre premises to residential use to increase crime vigilance and create less opportunity for unobserved crime and anti-social behaviour.

c) Support will be given for prevention of crime opportunities in the urban built environment by improvements to hidden or dark pedestrian footpaths.

POLICY WBC 6 – LIGHT POLLUTION

a) Insofar as planning consent is required, developments should mitigate through design, minimising night blight by using lower lumen lighting suitably positioned in a downwards direction and avoiding reflections onto surfaces.

b) New commercial and external light signage will only be permitted with justification for operational, safety or security reasons, designing in such a way to minimise spillage beyond the application site using guidance on lighting by the Institute of Lighting Professionals (ILP) GN01, the reduction of obtrusive light.

POLICY WBC 7 – NOISE POLLUTION

Developments will be encouraged at the design stage to consider measures that reduce vehicle noise and noise insulation with features such as trees and hedges in landscaping, and wall insulation.

12.1 Wellbeing is a term that embraces the many factors that individuals feel contributes to their state of physical, social, and mental health and while it recognises the aspects that are determined by people themselves, for example smoking, the potential to support individual wellness comes mainly from where they live and the quality of their local area. This includes enjoying a safe and pleasant environment, access to facilities for leisure, affordable and varied local services and being part of a cohesive community.

12.2 When people think about what makes a healthy place, they often naturally think about primary health care and hospitals, the services provided by the NHS, this is to be expected and is certainly important.

12.3 However, health care services have much less influence on people's health and general wellbeing than is often assumed. The NHS is good at treating people once they get ill. However, in terms of helping people stay happy and well, some of the most important factors are the neighbourhoods in which they live. In 2017 Public Health England acknowledged that a decent home, a job, and friends are more important to good health than the NHS.

12.4 The links between wellbeing and the environment around us shape our daily life by creating neighbourhoods where people have a sense of belonging and feel they are thriving. Such neighbourhoods include places to relax or play sport, opportunities to connect and socialise, access to nature and tranquility with walkable neighbourhoods that are clean with good air quality and safe, not isolated.

12.5 Within Cirencester, the population of approximately 20,000 at the last census shows a town with a quarter of its residents aged 65+ an age band that may be more dependent on their primary health care and local services being easily accessible, not requiring a car.

12.6 Intermittent or poor public transport can add to frustrations, anxiety and feelings of loneliness and social isolation. In addition, community assets and communal places to go and socialise are increasingly under threat. Community clubs, essential to many, need buildings to exist and are reliant on volunteers, yet are often vulnerable to budget cuts and justify strong policies on maintaining their venues. There is an ongoing loss of public houses, historically one of the most common socialising environments, now threatened by changing consumer behaviour and viability. Cirencester has now lost most of its neighbourhood public houses.

12.7 The changing retail scene has also accelerated the numbers of vacant central empty ground floor premises which, with change of use, could become future hubs for recreational and social activity, hybrid working and community clubs, even the modern church.

12.8 Planners recognise vacant ground floor spaces could add to or replace non-viable community assets, providing flexible venues that could change throughout the day, for example a toddler soft play area during the day and a martial arts club in the evening. Protecting such spaces is essential.

12.9 Similarly, children need good socialising facilities near their homes, not requiring transportation to access if they are to develop independence and life skills. Scouts and Guides, youth clubs, gym and dance clubs all need places to use, easy to access and well maintained.

12.10 Young adults, as they move away from formal education, can feel their community no longer provides age-appropriate facilities near their homes resulting in less meaningful opportunities to spend time with peers and declining mental health. Cirencester particularly lacks indoor facilities for the 16-18 age group unless in an organised activity such as Air Cadets.

12.11 All of these create a picture of the community infrastructure needed to facilitate the elements of wellness for all ages.

12.12 The Neighbourhood Plan has the opportunity to strengthen the community infrastructure and improving the environment that contributes to helping people within the town flourish, providing opportunities for enrichment, encouraging physical health and ensuring wellness is supported through the following policies.

12.13 Air quality is the largest environmental risk to public health in the UK. Long term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases, leading to reduced life expectancy. Even short-term elevation of air pollution can also cause a range of healthimpacts including the exacerbation of asthma. Vulnerable groups such as children, people with chronic diseases and the elderly, are particularly sensitive to the dangerous effects of air pollution which also affects the fabric of our buildings, acidification of our ecosystems and the loss of biodiversity.

12.14 Air quality is not only affected by the carbon and nitrogen oxide from vehicle emissions but by particulate matter, small compounds that are gaseous and consisting of many chemical compounds, some of which are known to be toxic. Research is showing children with their young lungs may be particularly affected by these particulates which are known to travel large distances. Some of these toxins are known to be able to enter the bloodstream and thus transported round the body, lodging in organs such as the heart. These particulates are known to travel large distances in the atmosphere, half of which we know come from wood burners but the rest, in the main, are from vehicle tyre and brake wear. The heavier the vehicle the greater the friction with the road surface and the greater the displacement from the vehicle.

12.15 Limiting traffic through the historic streets of Cirencester and near its educational establishments is an important aim of the Neighbourhood Plan alongside the support of active travel measures that enhance opportunities to walk, cycle or use public transport. Measures to limit emission pollutants will also have the further advantage of protecting the heritage of the town, its architecture and historic core, from the damaging effects of acid rain to which exhaust gases contribute.

12.16 Other measures to consider include the siting of drive-through food establishments, especially near housing and education, where idling engines create air health inequalities with any compulsory air monitoring from large scale developments. There are currently two sites with a drive through which are situated within the Plan boundary near housing.

12.17 The Neighbourhood Plan looks to strengthen and support maintaining and improving air quality through active strategies. New development proposals will be required to contain information on air and dust quality monitoring and mitigation.

12.18 Other strategies related to air quality issues include the support for active sustainable transport to encourage less frequent personal car use and restrictions on all vehicle movement through the central core of the town centre. Restrictions on vehicle movement near educational sites at peak times and a resistance to drive- through food outlets.

12.19 The benefit will not only be the maintenance of good air quality Cirencester currently has, but the mitigation of any deterioration or rise in particulates from any shift, domestically or commercially, to electric vehicles that use the core road network of the town.

12.20 The Covid-19 pandemic has highlighted more than ever the importance our immediate environment has on personal wellbeing such as the ability to walk easily and safely, access local food stores, enjoy green and open spaces and develop strong community cohesion. Planning decisions can unfairly impact upon vulnerable groups creating social isolation, limited food choices, poor transport links and lack of access to local services.

12.21 The Royal Town Planning Institute recognises that town planners have an important role in tackling public health issues from making streets safer and more attractive for walking creating new green spaces and locating housing where there are services, reducing car dependency.

12.22 However, whilst the NPPF recognises that health as a parameter in planning decisions is useful, it makes no requirement for their use and inclusion as a tool despite stating planning should enable and support healthy lifestyles, especially where this would address identified health and wellbeing needs. The use of Health Impact Assessments (HIA) would address this anomaly and are being considered as part of a Local Plan review by Cotswold District Council.

12.23 HIAs, recognised by the World Health Organisation as a tool that puts health at the heart of the planning process, may require wider consultation

and collaboration with implications for partnerships, money, and timetable. In doing so they can give local communities the voice to empower how and where housing is built, creating sustainable communities that do not unfairly affect disadvantaged groups. Support will be given to the future development of Integrated Impact Assessments (IIAs) for town planning decisions which include health and environment.

12.24 The Neighbourhood Plan supports the use of HIAs with progression towards IIAs to ensure that development holistically supports all parameters of health through active connections, community infrastructure and recreation, food stores and the principles of the 20 Minute Neighbourhood model.

12.25 The population of Cirencester is generally healthy. However, this status conceals the existence of some that experience poor health outcomes or have health-limiting living conditions. The 2021 census shows 1% of the town still live without central heating. These conditions are usually associated with socio-economic deprivation and occur in some wards of Cirencester. Children living in poverty within the town account for 10.9% of all children under the age of 16, a figure that has remained relatively unchanged for the last decade. To reduce these vulnerabilities, future housing and infrastructure must address employment access, social cohesion, and opportunities for physical health.

12.26 Equal access to public and green open space is a right protected by the Equality Act of 2010 which prohibits direct and indirect discrimination meaning Local Authorities managing urban green and blue spaces have a duty to advance equality of opportunity in access, ensuring that disabled people can use them to the same standard as everyone else.

12.27 Similarly, developments must accommodate movement around and from residential buildings to the outside although proposals and outcomes may be silent on how the landscaping relates to all residents, for example, how safe females feel walking along the footpaths to onward destinations, or how those with visual impairments can navigate obstacles and links.

12.28 The main physical, psychological and organisational features for accessing outdoor space include:

12.28.1 easy and well signposted alternatives to steps;

12.28.2 accessible toilet and changing spaces facilities;

12.28.3 accessible links to outdoor spaces from disabled parking bays;

12.28.4 flat, wide and well-lit footpaths, easily seen by other members of the public supporting the perception of safety;

12.28.5 accessible visitor guides for all.

12.29 In development these may extend to how planting is arranged, ground level or some raised, use of fragrant landscaping with benches in shade for rest and the avoidance of dense high shrubs.

12.30 The Neighbourhood Plan has the key requirement that quality of landscape design in new development is high to improve equality and enjoyment of the environment with appropriate access requirements for all users. Better accommodation for those with disabilities will allow them to enjoy green and open spaces through signage and improved access provision and the benefit will be the green and open spaces within Cirencester can be enjoyed by all.

12.31 Physical exercise, which is accessible, easy to use and free has never more been important at a time when life is increasingly distracted by screen time, staying inside over venturing out and socially connecting digitally rather than face to face. The result is rising obesity, heart disease, other life limiting diseases and children who are failing to play outside.

12.32 Outdoor play is especially crucial for a child's development although it benefits people of all ages. All children benefit from being outside, interacting with their environment, learning from nature, as part of a team on a sports field or using a playground.

12.33 These experiences can be powerful for children with disabilities and why accessible inclusive playground equipment provided in all play areas is important. A variety of equipment can accommodate not only inclusivity but sensory play or calm areas for those with autism who are sensitive to noise.

12.34 Play through sport for any age can relieve stress, supercharge learning, and make work more productive whilst connecting with others. Cirencester has benefited from the installation of recent free for use outdoor gym equipment in Four Acre Field, Thistle Park, City Bank and Kingshill Sports Complex. It is hoped more can be added at other sites. Comments collected through community engagement showed protection of town play spaces was very important.

12.35 Support will be given to improving existing play spaces, including at the Abbey Grounds and St Michael's Park, and to creating new facilities in neighbourhoods where these facilities are lacking, particularly identified in the Beeches ward. Design and equipment specifications should pay due diligence to inclusivity and mobility access particularly the appeal to all genders, girls have been shown to prefer areas of quiet seating and avoid environments that focus on only one activity alone such as the skateboard park at the Kingshill Sports Complex.

12.36 Support will also be given to extending access to sports fields in the town, particularly when not being used by sports clubs and educational establishments.

12.37 In new developments, play spaces should:

12.37.1 be easily accessible and not difficult to access behind any physical barrier;

12.37.2 be accessible to the general public and be designed so as to feel that it is part of the public and not private realm;

12.37.3 create a safe environment, appropriately considering lighting and layout to reduce the fear of crime;

12.37.4 be inclusive and gender neutral.

12.38 The benefit of this approach will be to provide accessible and inclusive playgrounds and outdoor fitness spaces for all ages.

12.39 'Play on the Way' interventions as a method of encouraging children to walk are supported by the Neighbourhood Plan. These should be integrated into the streetscape on different street levels to create interest and diversity and can include unique paving elements such as hopscotch grids, steppingstones, and items to navigate.

12.40 Community assets or the infrastructure that enable members of the community to meet are defined as buildings or facilities, as opposed to organisations and services; typically, these include pubs, community halls, churches, and venues in public ownership, for example the Bingham Library in The Waterloo.

12.41 They can also be privately owned, used regularly as places for worship or on an ad hoc basis for events and activities such as scouts and gym clubs, providing space for socialising, cultural activity or as an affordable space for private hire.

12.42 Some buildings provide for one type of activity whilst others offer diverse facilities in response to the needs of the local community. For example, Cirencester Baptist Church, a relatively new building, offers room hire for non-religious meetings and clubs and the Bingham Hall regularly hosts theatre productions and dance groups. All contribute to the wellbeing and social cohesion of the town, typically enhancing and maintaining quality of life.

12.43 Venues such as the Barn Theatre, exhibitions at the Coronium Museum and craft workshops at New Brewery Arts are much loved and used, although the town lacks a permanent dedicated cinema facility, the original having been demolished and never replaced.

12.44 Live music is enjoyed during the annual Phoenix Festival with regular events at the Sundial Theatre based at Cirencester College, but within the core of the town centre there is limited capacity to enjoy regular live music. A strong cultural scene attracts support of the local economy by residents and visitors alike, compensating in part for the changing retail economy by increased use of hospitality and the night economy.

12.45 The retention of public houses post pandemic has become particularly poignant as the public regain the confidence to return to social indoor spaces.

Some neighbourhoods have either lost their local pub to new residential housing or only saved after a change of ownership, such as the Plough at Stratton.

12.46 These community facilities within Cirencester provide an important resource for all residents and responses from community engagement show there was strong support for the protection and retention.

12.47 The viability of a community asset proposed as being removed will therefore require a report, prepared by an independent professional, justifying financial and marketing evidence for the sale or change of use. This should include evidence that the asset has been marketed for sale or to rent at local and regional level for a minimum of 12-18 months with the applicant covering the cost of the assessment before any planning application is submitted for change of use.

12.48 Ground floor town centre retail space that has become redundant will also be viewed as having the potential to extend community space for hybrid working or as a shared facility for local activities or groups.

12.49 The Neighbourhood Plan therefore seeks to resist the loss of ground floor redundant town space to residential usage and will support its retention as a community facility. It will also require viability assessment for the loss of a community asset while extending where possible current community provision particularly for live music, indoor sport, youth provision and a cinema. The benefit will be to protect and where possible extend community assets and their contribution to physical and mental wellbeing.

12.50 Crime, fear of crime and anti-social behaviour can all have negative impacts upon community wellbeing and the quality of life. As well as the direct costs of crime experienced by its victims, the fear of crime contributes to social exclusion, particularly for vulnerable groups such as women, the elderly, children, and ethnic minorities. Crime also threatens the success and vitality of town centres and employment areas by acting as a hindrance to economic activity and particularly night-time prosperity.

12.51 Research shows crime is less likely to occur where there is a perception of being seen, alongside a strong sense of public pride when anti-social behaviour is more likely to be challenged.

12.52 Promoting good design and layout in a development is one of the most important ways in which policy can address community safety issues. They can make crimes more difficult to commit, increase the likelihood of detection and improve public perceptions of safety. Conversely, poor landscaping and urban design can directly compromise the safety and security of people and properties.

12.53 Poorly positioned trees and shrubs or the use of inappropriate species close to buildings, lighting, pedestrian routes, and public areas can increase crime and anti- social behaviour by obscuring vision or providing hiding places. Planting shrubs with thorns or sharp spines in front of vulnerable boundaries or buildings can deter potential intruders whilst enhancement projects to support nature's recovery should consider growth rates, heights and spread. There should also be the avoidance of potential climbing aids such as the poor placement of commercial bins, which may give easy access to properties.

12.54 Other design approaches include:

12.54.1 having the main access to a building at the front, facing the street or communal entrance courtyard;

12.54.2 making sure doors and windows face onto the street and other places where surveillance is needed;

12.54.3 avoiding blank walls that enclose public areas;

12.54.4 private areas being clearly defined through appropriate boundary treatment, and care taken to limit opportunities for intruders to gain easy access to the rear of buildings;

12.54.5 car parking being open and clearly observed close to occupied buildings.

12.55 Mixed residential developments also have many benefits but significantly encourage different lifestyle patterns of activity, another deterrent. Developments that house diverse demographics with different lifestyle patterns better deter opportunistic crime. Cul-de-sacs and dead ends should be avoided with their reduced pedestrian movements and opportunities for unobserved crime.

12.56 Town centre criminal activity and anti-social behaviour can also be reduced through the mixed use of its buildings, particularly change of use to upper floors for residential, essentially 'living over the shop' as supported elsewhere in this Plan. This increases the diversity and inclusiveness of the area and thus increases natural surveillance throughout the night. This in turn can alter people's existing perceptions and reduce the fear of crime.

12.57 National planning policy (NPPF refers) makes clear that crime prevention can be a material consideration in determining planning applications and the Neighbourhood Plan looks to support crime avoidance in design. The benefit will be the limitation of opportunist crime and improved public perception of safety and feeling safe.

12.58 The benefits of reducing light pollution and gaining darker skies are wide ranging and include astronomy education, mental health, benefits to wildlife, sleep patterns, energy saving and carbon targets.

12.59 Aside from humans, plants and animals depend on earth's daily cycle of light and dark rhythm to govern life-sustaining behaviours such as reproduction, nourishment, sleep, and protection from predators. Scientific evidence suggests that artificial light at night has negative and deadly effects on many creatures including amphibians, birds, mammals, insects, and plants. The impact of light pollution on wildlife corridors is particularly detrimental to nocturnal animals, who sleep during the day and are active at night, radically altering their night-time environment by turning night into day. According to researchers for nocturnal animals the introduction of artificial light probably represents the most drastic change human beings have made to their environment that is detrimental to wildlife.

12.60 Glare from artificial lights can also impact wetland habitats such as the River Churn that is home to amphibians such as frogs and toads whose night-time croaking is part of the breeding ritual. Artificial lights that disrupt this nocturnal activity, interfering with reproduction can reduce populations with reports the common toad has declined by two thirds since the 1950s.

12.61 Humans also adhere to a circadian rhythm; this is our biological clock, a sleep-wake pattern governed by the day-night cycle. Artificial light at night can disrupt that cycle. An increased amount of light at night lowers melatonin production, which results in sleep deprivation, fatigue, headaches, stress, anxiety, and other health problems. Melatonin helps keep us healthy. It has antioxidant properties, induces sleep, boosts the immune system, lowers cholesterol, and helps the functioning of the thyroid, pancreas, ovaries, testes, and adrenal glands. Reduced production of melatonin and particularly its consequence on sleep quality has therefore enormous implications for physical wellbeing.

12.62 Alongside this, the natural beauty of the environment is diminished through glare, shown in a 2016 survey by the Council for the Preservation of Rural England (CPRE).

12.63 Compiled from interactive satellite maps it shows the extending skyglow within the town, each pixel shows the levels of radiance to the night sky, the darker the colour the higher the concentration of light pollution.

12.64 According to the Cotswold Conservation Board statement of 2019 (Dark Skies and Artificial Light) there has been a significant decline in the darkest of dark skies within the Cotswold's since the 1990s.

12.65 Planning policies and guidance do make some provision to control light pollution. The NPPF in 2019 states planning policies and conditions should limit the impact of light pollution from artificial light with no further requirement. The Cotswold District Local Plan references external signage, mainly in a commercial capacity, but is less detailed in how. On a practical level, where lighting is required, better spectrums of 3000 kelvins or less with shielding of upward glare and a downward orientation would go some way in the first instance to improving the situation.

12.66 Beyond this, measures could involve passive infrared motion sensors, orientation and position of glazing/windows and dimming measures. This will become particularly important where residential development will extend the currently green boundaries of the town.



12.67 The Neighbourhood Plan therefore has the key requirement that developments consider lighting intensity, height and angle, shields, control mechanisms and timers or motion sensors and that reflective building materials are avoided especially large areas of glazing near water bodies and wildlife corridors. This will support a dark skies strategy for the town that limits new external unjustified lighting, protecting areas of recreational dark sky with street lights that are orientated downwards, limiting upward spillage. The benefit will be better protection of the dark night sky and the wellbeing of nocturnal wildlife.

12.68 Hearing as a sense evolved to alert humans to changes in their environment whether foraging for food or warning of nearby danger. Modern life has filled ears with considerably more sounds than our ancestors, many useful still but they become 'noise' when they are unwanted, interfering with concentration, working, talking, listening, or sleeping. Unwanted noise can go on to cause serious long-term harm to health.

12.69 Today, noise is the second largest environmental cause of ill health after air pollution and a WHO (World Health Organisation) study found that at least one million healthy life years are lost every year in Western Europe as a result of exposure to excessive environmental noise. Furthermore, a UK focused study by the Science for Environment Policy showed that exposure to noise above recommended levels resulted in additional cases of dementia, stroke, and heart attacks.

12.70 Towns such as Cirencester are nosier places than the surrounding rural countryside. Travel networks particularly create sound, even with a greater use of the quieter electric vehicles. Typically, housing growth extends the population movement in cars.

12.71 Other noise disturbance can come from construction, the night economy, haulage vehicles cutting through local streets and anti- social behaviour taking the opportunity to use the quieter traffic conditions for speeding or racing.

12.72 WHO defines a daytime noise threshold that minimises health impact as 55 dba, moderate traffic is typically 75 dba. At this level research has shown the noise from this moderate level of road traffic impairs cognitive functioning in children, including attention, concentration, sound discrimination, memory, and reading ability. Some children as a result, develop deficits in reading ability and suffer lower school performance.

12.73 Similarly, WHO also stated a night-time level of 40 dba is conducive to quality sleep. Noise above this can make it difficult to fall asleep, and abrupt noises

can cause awakenings, which the sleeper may not sense or recall but still affects the sleep rhythm. Even at levels below which awakening may occur, noise produces measurable physiological reactions, such as an increase in heart rate and body movements and can cause disturbances of natural sleep patterns by causing shifts from deep or REM (rapid eye movement) to lighter stages.

12.74 People affected by noise may get up tired or not rested in the morning. For the level of noise produced by a busy road, the proportion affected by sleep disturbance becomes significant. Chronic or repeated exposure to sounds at or above 85 db can also cause hearing loss.

12.75 While urban noise may seem inevitable and unavoidable, especially in an environment like Cirencester, even the most dense and active places can take steps to limit noise within the urban environment or mitigate in design. Town landscaping can look to increase the extent and height of evergreen landscaping and street trees which absorb traffic noise and act as a buffer to residential areas. Additionally, trees will benefit carbon capture, add character and ambience especially where urban layout is dense.

12.76 Traffic calming measures can act as a deterrent to car speed and support consequent noise prevention through needless acceleration or the ability to use road networks as rat runs.

12.77 Local community engagement showed residents valued the relative tranquility of Cirencester and want it protected as much as they value other reasons for enjoying living here. Growth will bring an unavoidable increase in the level of movement and noise, the Neighbourhood Plan will support mitigation measures that minimise the unnecessary extension of current levels.

12.78 The Neighbourhood Plan therefore requires at the design stage, that all proposals should provide adequate wall acoustic insulation to protect households from external noise, combined with better or less glazing or reduced window space and improved ventilation that limits the need to open windows.

12.79 Landscaping noise transfer buffers, combined with reduced or better hard ground surface barriers, that are near the source of noise will help minimise urban noise pollution, alongside visual greenery and soil mounds, which can reduce the perception of noise.

12.80 Throughout the process of preparing the Plan, the following community aspirations were identified:

12.80.1 measures that reduce traffic volume near educational establishments, particularly at peak times;

12.80.2 measures that reduce vehicle movement in the town centre's historic streets, particularly Park Street, Dyer Street, Thomas Street, and the Market Place;

12.80.3 monitoring of air quality, including particulates, within the town being increased through locations identified as having greater risk of deterioration and particularly near educational establishments.



APPENDIX 01

NEIGHBOURHOOD PLAN PROJECTS

ENVIRONMENT & SUSTAINABILITY

1. Develop a multi-agency flood mitigation town strategy including river management and flood warden activity.

2. Establish a strategy for the location and provision of vehicle re-fuel stations (to include electric and hydrogen fuel) and photovoltaic arrays in appropriate locations across the town.

3. Audit mapping of natural habitats and wildlife corridors including riverine to enable protection, enhancement and to identify for public enjoyment.

4. Seek to ban single use plastics across the Plan area through a town centre policy.

5. Document key habitats, wildlife corridors and plan enhancements.

ACCESS & MOVEMENT

6. Establish a series of connected cycle and walking paths around the edge of town ('the wheel') that connect to routes into the town centre ('the spokes'). This will help address the physical barrier caused by the inner ring road.

7. Establish longer distance walking and cycle paths as follows: from Cirencester to Kemble; from Cirencester to South Cerney; from Siddington to Stratton (improving the current inadequate shared space along the Gloucester Road); and from Cirencester to Sapperton.

8. Develop enhanced regular, all-week (including late evening) rapid and frequent public transport connections to key regional centres (e.g. Cheltenham), rail interchanges, hospitals, and local destinations (e.g. Fairford and Tetbury).

9. Research and locate potential site for new Park & Stride car parks.

10. Create an updated walking map for Cirencester and its countryside connections that includes the wheel and spokes and identifies small spaces for social encounters, together with green and pleasant routes to link where people live with the town centre.

11. Changes to the A419 and A429 dual carriageways to create direct, convenient, safe, street level, priority pedestrian and cycle crossings on desire lines to allow Cirencester's most important active travel routes to cross the dual carriageways and access the town centre. Seek reduced speed limits on the A419 and A429 on the approaches to the new crossings.

WELLBEING

12. A project to encourage the opening up of education buildings and grounds for community and public use during holidays, weekends, and evenings.

13. Increase the number of neighbourhood community assets (e.g., halls and similar spaces, play areas etc) in The Beeches, outer Watermoor, Kingshill, Kingshill Meadow and Chesterton.

14. Audit of all social, sports and recreational facilities to ensure the type, distribution, and quantity is appropriate for a growing population and that they are inclusive of gender, age, and disability. Create an action plan to meet shortfalls.

15. Raise awareness, locate, and develop potential sites for Community Supported Agriculture projects and allotments within the peri urban areas of the town and linked to the 'wheel' and 'spoke' cycle route system. This will increase the economic resilience and sustainability of the town.

TOWN CENTRE

16. Establish a Business Improvement District (BID) for the town centre.

17. Establish a Town Centre Business Manager to develop a stronger economic voice for the town, to enhance the night-time economy, the promotion of the town to more employers and to lobby infrastructure investment.



18. Reconnect the Roman Amphitheatre to the town centre core, the Old Kennels car park, and other neighbourhoods, working with AQIVA and Gloucestershire Highways to identify a new connection location, funding, and type, to be supported by brown heritage signage and improved maintenance.

19. Identify a town centre site/building and an operator for a new cinema project, to possibly be part of a venue that can also support live music.

20. Research, map, and audit for potential residential accommodation over retail within the town centre.

21. Proposals for the transformation of the town centre car parks. To enhance the townscape and urban form to create quality public open space of the Forum, Brewery Sheep Street and Station car parks closer to the traditional northern quarter of the town. To enhance walkability and connectivity and create potential capacity for residential and commercial accommodation and community assets.

VISITOR ECONOMY, CULTURE & SKILLS

22. Create a cultural strategy and map of the town including a digital walking app.

23. Digital walking app for the Amphitheatre and its connection to other areas of Roman Corinium.

24. Support for a heritage trail, new wayfinding systems and quality signage.

25. Create a Cirencester Sustainable Tourism Strategy, to enhance the visitor experience separate but linked to a Cotswold-wide strategy that includes the Water Park.

26. Establish better links with regional/Gloucestershire business and skills bodies and exploit Cirencester's education cluster reputation to attract new businesses to add placements for digital, agri-tech, finance and other high value skills and to provide routes into local work.

27. A cyber strategy to better facilitate hybrid working and improve facilities for tourists and townspeople by upgrading broadband connectivity, providing Town Centre Wi-Fi and improving mobile phone data signal.

28. Draw up a model for developers to support local construction skills development for A-Level students on long placements at Cirencester College through to T-Level placements and taking on apprentices.

29. Encourage businesses to offer placements for young people to develop skills which the town needs for the future and to provide routes into work locally.

30. Research and locate a site for a replica 'Roman Garden'.

31. Promote the establishment of cultural festivals within the town, such as music, fine art, craft, and literature.

APPENDIX 02

COMMUNITY ASSETS - KEY LOCAL DAILY FACILITIES

As part of the preparation of this Plan, an audit of existing Key Local Daily Facilities was carried out to ascertain which parts of the town are 'complete' 20 Minute Neighbourhoods and which have a deficit of Key Local Daily Facilities.

These facilities are categorised as follows:

- **primary schools** - defined as state schools for primary education Years 1 to 7 which are non-selective

- **grocery shops** - defined as supermarkets, newsagents and convenience stores, open throughout the day

- **green spaces** - defined as accessible to the public throughout the day including cemeteries and public open space with permissive rights; excludes private land with permissive rights of way, open spaces which are chargeable to access, allotments and residential amenity land

- **public meeting places** - defined as pub's or café's open during the day

1. Primary Schools

1.1 Powell's School, Gloucester Street, GL7 2DJ

1.2 Cirencester Primary School, Victoria Road, GL7 1EX

1.3 Chesterton Primary School, Apsley Road, GL7 1SS

1.4 Stratton Primary School, Thessaly Road, GL7 2NG

1.5 Watermoor Primary School, Kingshill Lane, GL7 1JU

1.6 Paternoster School, Watermoor Road, GL7 1JR

2. Grocery Shops

2.1 Stratton SPAR Convenience Store and Post Office, Cheltenham Road, GL7 2HU

2.2 Abbey Way Services SPAR, Gloucester Street, GL7 2DR

2.3 Tesco Express, Cricklade Street, GL7 1HY

2.4 M&S Simply Food, Dyer Street, GL7 2PF

2.5 Morrisons Daily, Dyer Street, GL7 2PP

2.6 Waitrose, Sheep Street, GL7 1SZ

2.7 Tesco Express, Chesterton Lane, GL7 1XQ

2.8 Budgens Store, Shell Garage, Chesterton Lane, GL7 1YD

2.9 Lidl Store, Midland Road, GL7 1YG

2.10 Aldi Store, Cricklade Road, GL7 1NP

2.11 Tesco Extra Store, Cricklade Road, GL7 1NP

2.12 The Beeches Premier Store, Upper Churnside, GL7 1AP

2.13 Mounties Store, Mount Street, GL7 1TJ

3. Green Spaces:

3.1 Abbey Grounds

3.2 Amphitheatre

3.3 Baunton Lane Playing Field

3.4 Chesterton Cemetery

3.5 City Bank Nature Reserve

3.6 City Bank Recreational Ground

3.7 Cricklade Road Picnic Site

3.8 Cranhams Lane Field

3.9 Four Acres Field

3.10 Holy Trinity Watermoor Garden of Remembrance

3.11 Humpty Dumps

3.12 Jack Gardner Memorial Garden

3.13 Kingshill Country Park

3.14 Kingshill Playing Field

3.15 Querns Wood

3.16 St John's Closed Churchyard

3.17 St Michael's Park

3.18 Stratton Cemetery

3.19 Thistle Park

3.20 Two Acres Field

3.21 Watermoor Road Cemetery

3.22 Victoria Road Meadow

4. Public Meeting Places

4.1 The Plough Inn, Gloucester Road, GL7 27B

4.2 Drillman's Arms, Gloucester Road, GL7 2JY

4.3 The Marlborough Arms, Sheep Street, GL7 1QW

4.4 Black Horse, Castle Street, GL7 1QD

4.5 The Brewers Arms, Cricklade Street, GL7 1HY

4.6 The Twelve Bells, Lewis Lane, GL7 1EA

4.7 The Golden Farm, Upper Churnside, GL7 1AR

4.8 The Bear, Dyer Street, GL7 2PF

4.9 The Bees Knees, Watermoor Road, GL7 1LF

4.10 The Golden Cross, Black Jack Street, GL7 2AA

4.11 The Crown, West Market Place, GL7 2NH

4.12 Odd Socks Café, Elliot Road, GL7 1YS

4.13 Gilo's Café, Love Lane, GL7 1YG

4.14 Roots and Seeds, The Old Kennels, GL7 1UR

4.15 Rave, Phoenix Way, GL7 1YG

APPENDIX 03

LOCAL GREEN SPACES DESIGNATION

7. BAUNTON LANE PLAYING FIELD



Full size football pitch and recently renovated children's playground with tunnels, slides and climbing frame, accessed off Baunton Lane. Also used for community gatherings and maintained by volunteers. Owned by Cirencester Town Council.

19. CITY BANK RECREATIONAL GROUND



Flat open recreational field of 1.56 hectares bordered and enclosed by City Bank Park and City Bank View, with footpath access through to the adjacent nature reserve. Used mainly for leisure it also connects, by footpaths, the Beeches area of the town to Watermoor, and is well used by dog walkers. Access has been improved with the addition of a wood bridge over the River Churn which meanders along its edge. Fitness equipment sits near the remains of a sluice gate to one of the towns former mills. Ownership with Cirencester Town Council.

23. FOUR ACRE FIELD



Four Acre field covers 1.7 hectares in the Chesterton area of Cirencester and is bordered by Querns Wood, Chesterton Lane, Cotswold Close and the rear gardens of Chesterton Park. Used by dog walkers, weekend footballers and for other recreational activities, it contains a small playground and some outdoor fitness equipment. Recent re-wilding has extended its biodiversity and wildlife value with footpaths connected walkers through Querns wood to the town centre. Owned by Cirencester Town Council.

24. HAREBUSH WOOD



Harebush Wood was created in the 1820's by Jane Chester Master as a working 26.8 hectares wood with active timber production and remains privately owned by the family. It is open to the public as a circular walk on the edges of the town, home to bluebells and wildlife, accessible opposite the Norman Arch on the A417 Grove Lane or through the Burford Rd allotments. Owned by the Chester-Masters.

28. JACK GARDNER MEMORIAL GARDEN



Named after former Cirencester UDC Councillors John Edward Gardner and Graham Jack Brookes, the garden is a linear strip of recreational parkland, 1.87 hectares in size fronted by the A417 Abbey Way, bordered by Spitalgate Lane, Gooseacre Lane and the housing of Trafalgar Road. It contains a stretch of the River Churn and within has had the recent addition of rewilding areas with further tree planting to support others including a memorial tree to the actor Robert Adie. Appreciated by dog walkers, it also connects by footpath over Gooseacre Lane bridge, the East or Stratton area of the town with the town centre. Ownership with Cirencester Town Council.

29. KINGSHILL COUNTRY PARK



On the site of an old water meadow this 2.34 hectare Country Park sitting alongside a recent large housing development bordering the A419 Swindon Rd bypass and hosts an outside gym with a running/walking track. There are benches for picnics and a community orchard. Well used by local residents with access from Griffiths Close, it provides a circular recreational space alongside acting as a green buffer between residences and a major highway. Located within are 50 allotment plots. Owned by Cirencester Town Council.

38. QUERNS WOOD



Querns Wood, accessed from and bordered by the hospital grounds, the Amphitheatre and Four Acre field, is an area of woodland with the NHS hospital grounds which includes a network of footpaths used by walkers to connect Chesterton to the town centre and for recreational use. Originally an arboretum established by the owner of Querns House, now the hospital, the site is believed to be part of the Quarry area that became the Amphitheatre. Mainly maintained by volunteers several new trees have been donated by local businesses. Owned by Cirencester Town Council.

45. THISTLE PARK CHESTERTON COMMUNITY GARDEN



Thistle park community garden is set within a green open space landscaped with flowers and benches in the Chesterton estate, accessed along Springfield Rd. It contains a playground, open gym equipment and allotments owned and managed by Cirencester Town Council.

46. TWO ACRES



Two Acre field covers 2.2 hectares in the Chesterton area of Cirencester is bordered by Cranhams Lane on which there is gated access and the rear gardens of Foxes Bank Drive and Countess Lilias Rd. Used by dog walkers and for other recreational activities it connects by footpath to Thistle Park and onwards to the Thistle Park Community garden. Owned by Cirencester Town Council.

47. VICTORIA ROAD MEADOW



Located to the rear of Cirencester Junior School on Victoria Road, this former playing field has been restored to a meadow of wild flowers through the Wild Town rewilding scheme. Access from a passageway off Victoria Rd, a footpath connects through the meadow to City Bank nature reserve and the Beeches area of town. Well used by walkers.

APPENDIX 04

NON-DESIGNATED HERITAGE ASSETS

Using the criteria outlined by Historic England's local heritage listings advice, the Neighbourhood Plan has identified the following as non-designated heritage assets (NDHAs). This is not an exhaustive list and further NDHA's may be identified in the future that meet the criteria provided. Evidence for the justification is included and state of repair is not considered a relevant consideration.

CRITERIA

- A ARCHITECTURAL – age and locally distinct in material retaining significant structure
- B ARCHAELOGICAL – that there is clear evidence
- C GROUP VALUE – having association through use or design
- D RARITY – as judged against other features
- E LANDMARK – striking and strong association with location, event, or community
- F DESIGNED LANDSCAPE – garden setting, structured landscapes, and parks
- G EVIDENTIAL – documentation of past historical use or history
- H COMPLETENESS – enough fabric and features to be understood
- I SOCIAL HISTORY – illustrative of historic local life
- J ECONOMIC HISTORY – illustrative of historic commercial activity
- K COMMUNAL VALUE – connected with collective local memories



1. Open Air Swimming Pool at Riverside Walk

A B C **D** **E** F **G** **H** **I** J **K**

In the Conservation Area but unlisted as there are no heritage structures on the land (English Heritage) although some argue the pool is one. Could be vulnerable for development if deemed unviable. Historic documentation of establishment and use from 1869 including membership, ownership, and funding. Land currently owned by the Town Council with a peppercorn rent paid.



2. Council Offices on Trinity Road

A B C D E F G H I J K

Site of the Cirencester Union workhouse from 1837 although a parish workhouse existed on the site from 1724 as a different structure. The cruciform design remains, designed by Sampson Kempthorne to keep genders separated in newly constructed workhouses following the poor law amendment act of 1834. This significant layout remains and is evident and consistent with a 1902 map of the site (workhouses.org.uk). Later used as Watermoor Hospital from 1948 before becoming the Cotswold District Council offices. Listed lock-up (relocated) in the grounds but the building and site is unlisted and outside the conservation area.



3. Wall-Mounted Red GR Royal Mail Post Boxes in Six Locations [examples illustrated above]

A B **C** **D** **E** F G **H** **I** J K

There are four wall mounted GR post boxes installed, three during the period 1910-36 for King George V, one later 1936-52 for King George VI. There was a massive expansion of wall mounted post boxes from

1900 to extend the mail service, wall mounted boxes were cheaper and frequently used in more rural areas. Given how difficult they are to remove from boundary walls they have remained and remain in use. Group value in five locations:

- Beeches Car Park on London Road
- Junction of The Avenue and Victoria Road
- Ashcroft Road
- Lewis Lane
- Thomas Street
- Gloucester Street



4. Army Reserve Centre at 55 Somerford Road

A B C D E F G H I J K

Currently the home of the Royal Gloucestershire Hussars squadron of the Royal Wessex Yeomanry, the main building was built as Hampton House in 1868, later a school then used during WW2 for an anti-aircraft regiment defending the docks of Bristol, Cardiff, and Gloucester. Post war the Hussars moved in and remained. Now expanded as an active base, the original home remains and can be clearly seen. Unique to the area representing military presence in a market town post war.

















5. Blue Enamel Street Signs in Eight Locations

A B C D E F G H I J K

A group of surviving in-situ examples of early street signs made by Garnier and Co of London and erected by the then Urban District Council post 1894. Uniform in style, colour, size, fixtures they are set at the wall quoin or close by, a particular characteristic. Legal ownership is suggested as being with the owner of each property not the Highways Authority. Not currently protected by any heritage or planning legislation. Locations are:

- Ashcroft Road and Cricklade Street junction
- Gloucester Street and Barton Lane junction
- Castle Street and Park Lane junction
- Cecily Hill
- Spitalgate Lane and Dollar Street junction
- Lewis Lane and Cricklade Street junction
- Queen's Street and Victoria Road
- Mount Street and Somerford Road junction





6. Air Raid Shelter within Sheep Street Car Park and Associated Museum at Sheep Street

A B C D E F G H I J K

Museum housed in former hospital cottage which shows home front artefacts from WW2 with the associated former Memorial Hospital air raid shelter. The air raid shelter has been previously proposed for protection which was denied by the Secretary of State (2016) as it was not 'under threat'. The former hospital site has recently been developed by Cotswold District Council with potential future review of nearby land currently occupied by a supermarket. There is now a vulnerability to the site which would be best retained with the associated museum. An important part of the wartime history of the town.

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intentionally








7. Commemorative Enamel Street Benches in Three Locations

A B C D E F G H I J K

Made from iron, painted green and all commemorate a Jubilee event:

- Tetbury Road opposite the Leisure Centre, the Silver Jubilee of King George V 1910- 1936
- Abbey Grounds near Monk's Garden, the VR Jubilee of 1887
- Gloucester Road north of Overhill Road, the Silver Jubilee King George V 1910-1936



8. Former Oakley Hall Prep School Entrance Gate on Chesterton Lane

A B C D E F G H I J K

Confirmed in communication by the former school owner's son and pupil Quentin Letts as one of several entrances, although not the main, to Oakley Hall School, formerly Oakley Hall House 1890. Later occupied by Pelham House Prep School which relocated from Folkestone following bombing in 1914. Pelham prep became Oakley Hall School in 1928. Following closure of the School, the site was sold for housing in 1994. The unlisted gate on Chesterton Lane remains a public right of way through to the new housing. Metal gate brackets remain on the side walls showing evidence of use possibly through to the playing fields of the time.



9. Former Oakley Hall Prep School Chapel War Memorial Highfield Lane

A B C D E F G H I J K

Now located on the exterior garden wall of the former Oakley Hall School Chapel, which is now a private house, the memorial was commissioned and laid in 1919 when the chapel was built to commemorate the former headmaster of the school with those lost 1914-18, 48 names in total. Previously on the interior wall of the chapel towards the rear door, it was designed by Leonard Barnard FRIBA, a Cheltenham architect.









10. Commercial Shop and Business Signage

A B C D E F G H I J K

Evidence of previous commercial activity in various parts of the town remain on walls and pavements, contributing to the historical record of Cirencester as a market town with a diverse economy. Most are on walls of currently occupied buildings in the Conservation Area, despite which they currently afford no protection during renovation or alteration, two are embedded into pavements as mosaics.

- Gloucestershire Dairy Co. signage The Old Dairy building late 19th Century on Ashcroft Road
- Cabinet maker signage on 52 Lewis Lane
- Café Tariff menu signage on the wall at 17 Gosditch Street
- Preston's doorway mosaic (a grocer from the 1950s) on 69 Cricklade Street
- Ovens & Sons pavement mosaic (former furniture retailer) on Dyer Street
- Golden Farm Pub freestanding metal sign Beeches Road



11. Remains of Roman Pedestal West Way

A	B	C	D	E	F	G	H	I	J	K

Relocated to its current position and unprotected despite being archaeological evidence of Roman architecture.



12. Chesterton House Gate on Somerford Road

A	B	C	D	E	F	G	H	I	J	K

Former carriage entrance to Chesterton House on Somerford Road, home of Sir Charles Vyner Brooke, the gate was restored by the Civic Society and hosts a blue plaque and whilst the house, now flats, is listed not the gate.

13. Boundary Walls around St. Michael's Park

A	B	C	D	E	F	G	H	I	J	K

Historic boundary dry stone walls of Cotswold stone, indicating the original garden boundary of Watermoor House (1827).











The following have group value as evidence of the former railway line

14. GWR Railway Track Beds and Bridge

A B C D E F G H I J K

The railway station and its lines out from the town closed in 1964 but evidence of this past transport remain:

• End of Meadow Rd path to Sheep St Cirencester to Kemble track bed 1841-1964



• City Bank track bed





• Beeches track bed former line to Andoversford

• Bridge City Bank



• Chesterton Lane, remains of brick wall





15. Former Chapel at 14 London Road

A B C D E F G H I J K

Former Catholic Chapel shown on the OS map of 1844-1888, later a garage with commercial wall signage still showing. Unlisted and distinct in architecture as a former church with distinct window design.





16. a) Number 143 and 16. b) 145 Cheltenham Road

A B C D E F G H I J K

Mid-19th Century and possibly associated with the former Vale Yard commercial site shown on the 1939 OS map.



17. The Old Post Office 25 Albion Street

A B C D E F G H I J K

Former Post office from the early 19th Century, the red brick architecture is unusual for the area.



18. The Old Schoolhouse School Lane Stratton

A B C D E F G H I J K

Former association with education as a School House (OS map 1844-88) with its location on School Lane. Victorian architecture, Pevsner architectural guide to buildings in the Cotswold's references a national school here in 1858.





19.a) The Plough Inn at 5 Gloucester Road and 19.b)The Drillmans Arms 34-38 Gloucester Road

A B C D E F G H I J K

Two of the remaining public houses in this area, unlisted, the other being the closed Salutation Arms now lost, all near a former brewing site and representative of commercial and social activity 19th Century with associated cottages on a major highway for trade and travel.



20. The Old Barn 33 Gloucester Road

A B C **D** **E** F **G** H **I** **J** K

Rare example of former 19th century agricultural barn within a town boundary now residential, thatched roof replaced but architecturally still representative of its previous use with low roof line and length of the building.



21. Former Hope Inn Public House Querns Lane

A B C D E F **G** **H** **I** **J** K

Closed in 1975, the former Hope Inn originates from the 19th Century but is unlisted. Advertising signage of Simonds Brewery Ales, now hidden behind the current retailer's sign, shows this evidence of previous commercial activity. Architecturally plain, it is 19th Century architecture as a simple beer house is evident near what was the canal basin.



22. Stratton Mill

A B C **D** **E** F **G** **H** **I** **J** **K**

Former Corn Mill with some structure from the early 19th Century with later additions.



23. Former New Mills Sluice Gate City Bank Nature Reserve

A B C **D** E F **G** **H** I **J** K

Built about 1530 New Mill was a cloth mill until about 1830 when it became a flock mill. Demolished in 1912/13 some parts remain of which this sluice gate is one, used to control the water level in the adjacent mill stream.



24. Tudor Cottage at 25 Gloucester Road

A B C **D** **E** F G **H** I J K

Rare and the only remaining example of a thatched roof in the town.



25. Copelands Baunton Lane Stratton

A B C **D** **E** F G H I J K

Modernist design by Arthur Saint, architect, and the owner, built in 1948.



26. Numbers 38-40 Somerford Road

A B C **D** **E** F G H I J K

Neo-Gothic Architecture.





27. Barnway

A B C D E F G H I J K

Formerly known jointly as the Alma buildings, number 3 remains intact. 19th century architecture refers.

The following have group value (C) for 19th Century architecture (A) on the Cheltenham Road























A B C D E F G H I J K

28. 5 Cheltenham Road

29. Heathfield House ,31 Cheltenham Road

30. 33 Cheltenham Road

31. Spinnet Cottage, 35 Cheltenham Road

32. Rosemary Cottage, 37 Cheltenham Road

33. 39 Cheltenham Road

34. Claremont, 41 Cheltenham Road

35. Hill House, 43 Cheltenham Road

36. Old Quarry Cottages, 51 - 83 Cheltenham Road

37. Owl Cottage, 93 and 95 Cheltenham Road

38. Hillside Villas, 131-133 and 135-141 Cheltenham Road

The following have group value (C) for 19th Century architecture and early 20th Century architecture (A) on Albion Street











A B C D E F G H I J K

39. 9 Albion Street

40. 12-16 Albion Street

41. Orbel Cottages, 24-32 Albion Street

42. 27-31 Albion Street

43. 33-37 Albion Street

44. 53-57 Albion Street

45. Peartree House, 61 Albion Street

46. 63 Albion Street

47. 65 Albion Street

The following have group value (C) for 19th Century architecture (A) on the Gloucester Road













A B C D E F G H I J K

48. 6-16 Gloucester Rd (also qualifies as a Landmark E)

49. 19-21 Gloucester Road

50. 18-24 Gloucester Road/Albion Street (formally Salvation Inn)

51. Thessaly Cottage, Gloucester Road

52. Thessaly Lodge, Gloucester Road

53. Thessaly Croft, Gloucester Road

54. 66 Gloucester Road

55. 72-74 Gloucester Road

56. Wheel Cottage, 90 Gloucester Road

57. 94 Gloucester Road

The following have group value (C) for 19th Century architecture (A) on the Mount Street





A B C D E F G H I J K

58. 2-6 Mount Street

59. 1-17 Mount Street

The following have group value (C) for 19th Century architecture and early 20th Century architecture (A) on the Somerford Road









A B C D E F G H I J K

60. 2-14 Somerford Road

61. 30-36 Somerford Road

62. 20 Somerford Road

63. 21 and 23 Somerford Road

The following have group value (C) as distinct post-war architecture (A) on the Gloucester Road







A B C D E F G H I J K

After WW2, Britain was faced with a housing crisis causing a board of local people including the 8th Earl Bathurst to form the Cirencester Housing association. Land was donated by the Chester-Master family of which land on Shepherds Way was used, in the early 1950s, to build numerous Easi-form houses and the flats known as Beresford House. The houses on Chesterton Lane are in the same style as Park View, Stratton.

64. 53-87 Chesterton Lane with 37-47 Somerford Road

65. 1-15 and 2-16 Park View in Stratton

66. Beresford House Shepherds Way

A B C D E F G H I J K

67. Cirencester Waterworks, former Brewery and boundary walls

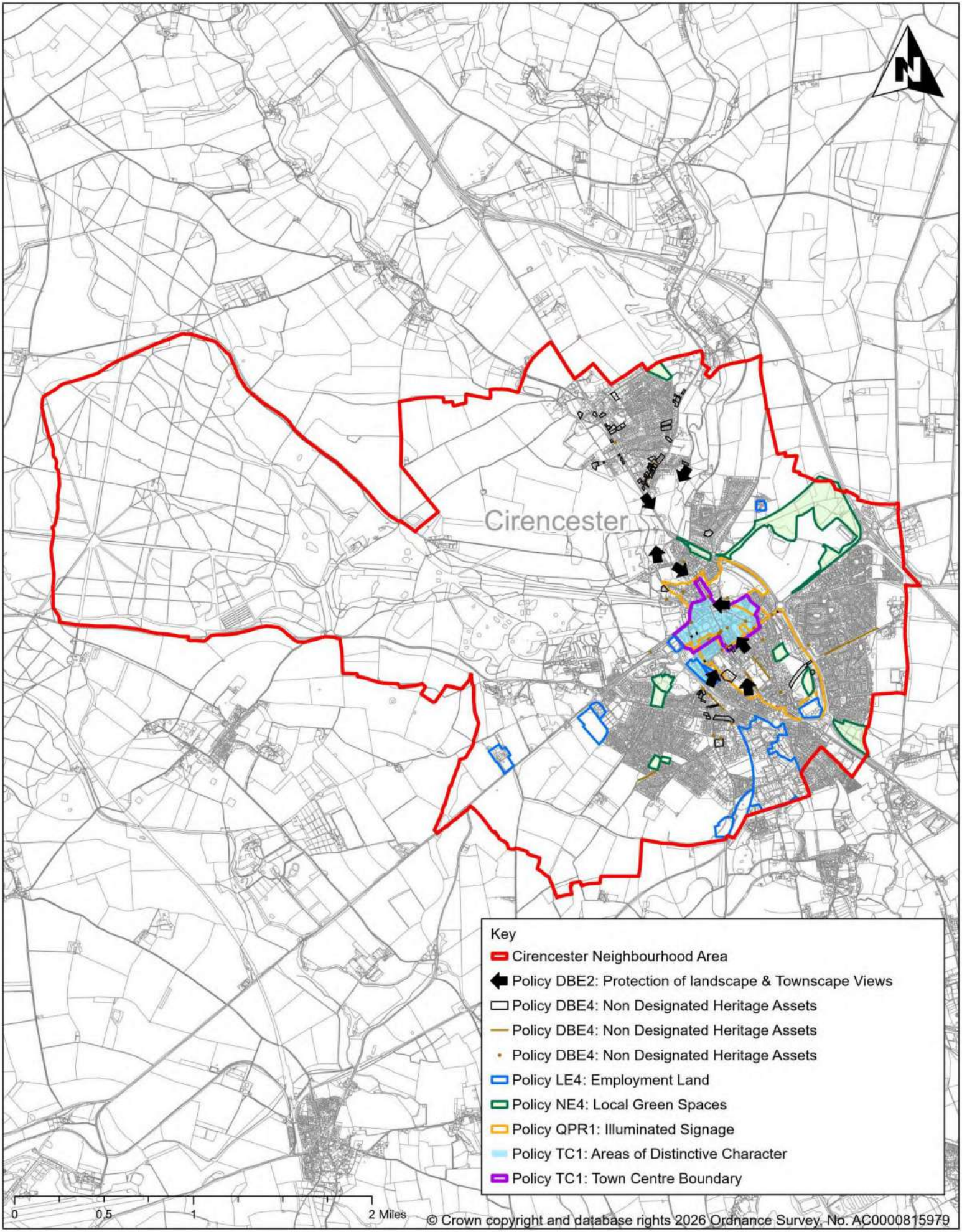
Cirencester Waterworks Company in 1882 converted the Cirencester Brewery Company premises in Lewis Lane into a water works.





Cirencester Neighbourhood Plan

cirencester
· town council ·



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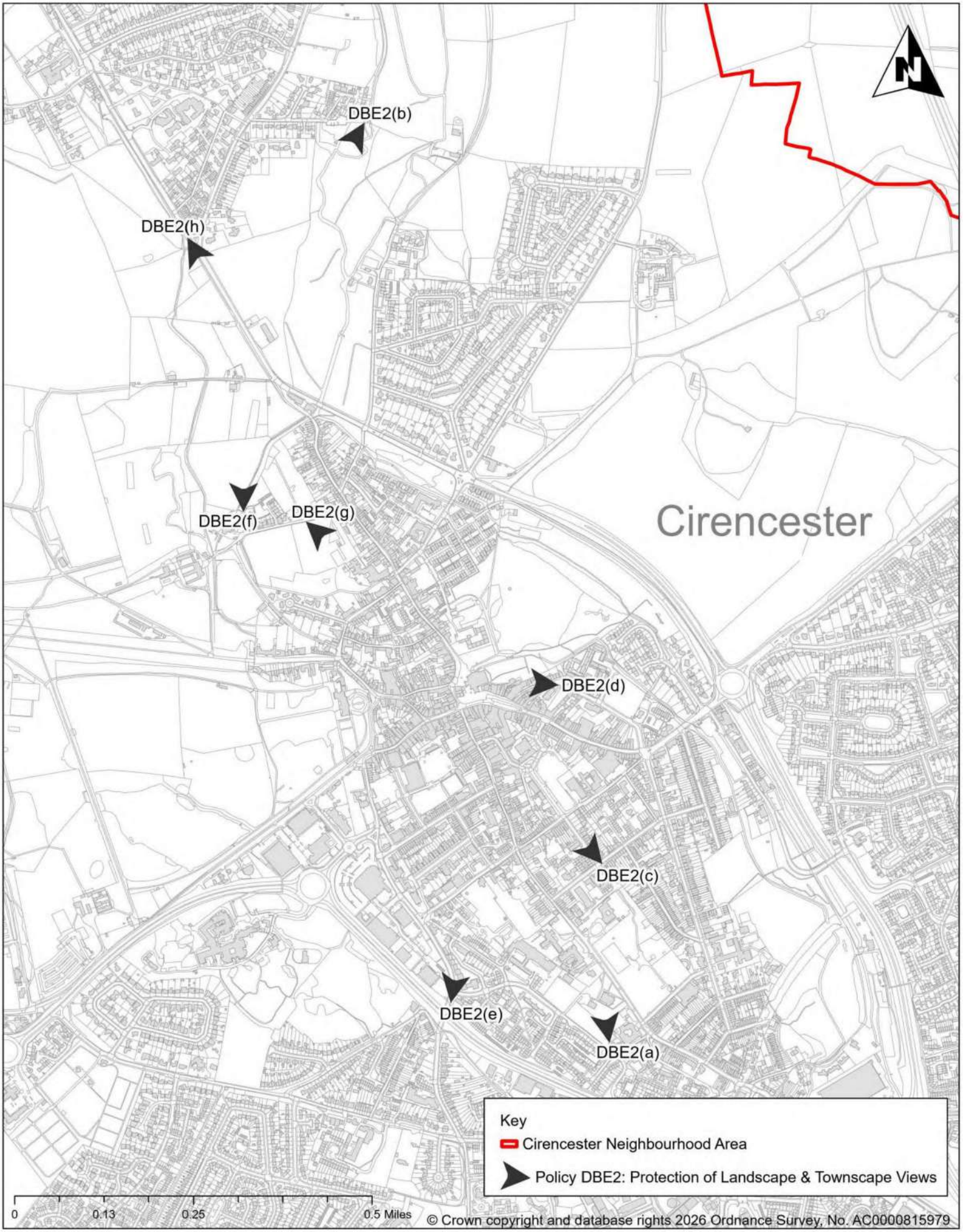
Cirencester Parish Neighbourhood Development Plan

Policies Overview Map

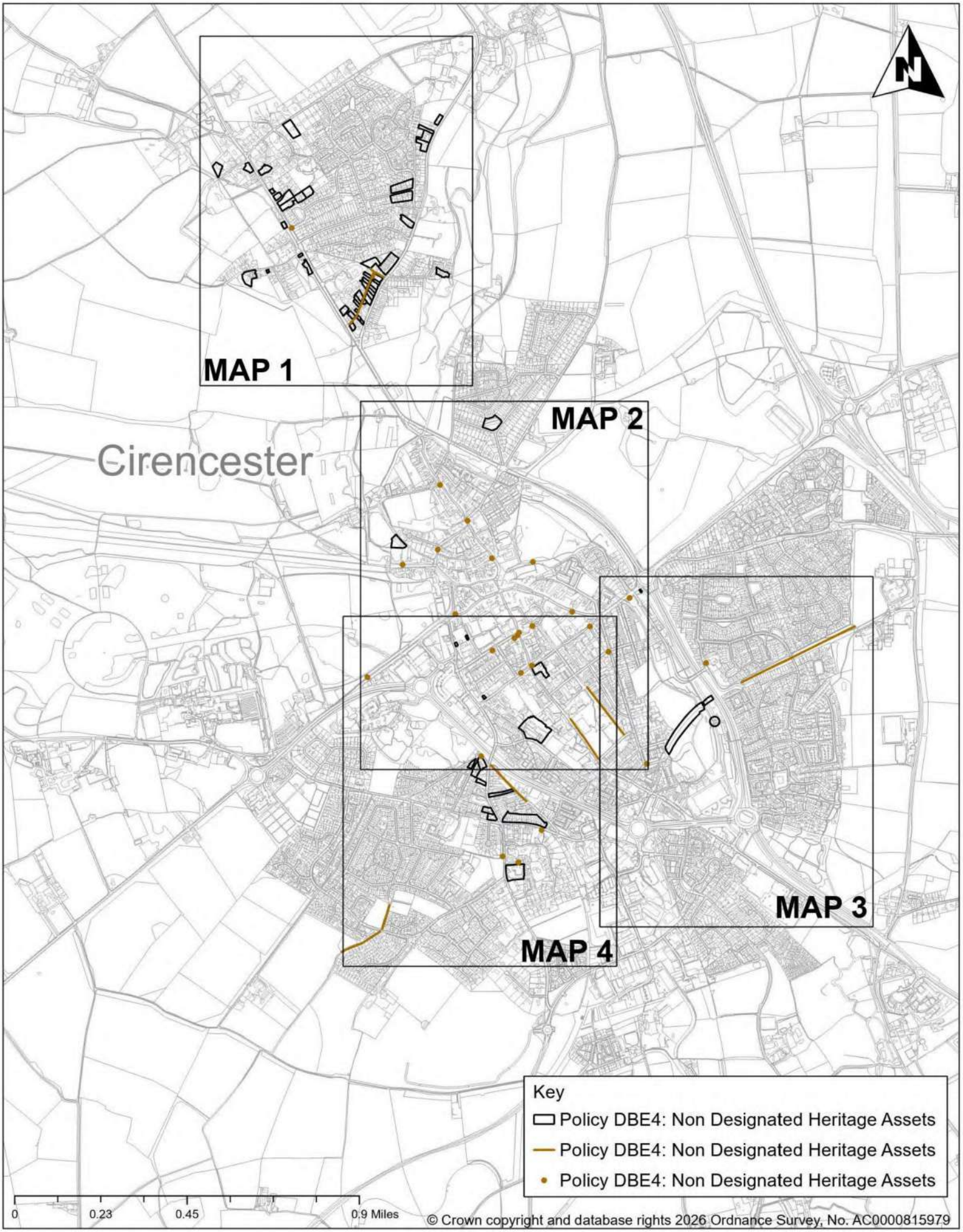
COTSWOLD District Council



Cirencester Parish Neighbourhood Development Plan

Policy DBE2: Protection of Landscape & Townscape Views

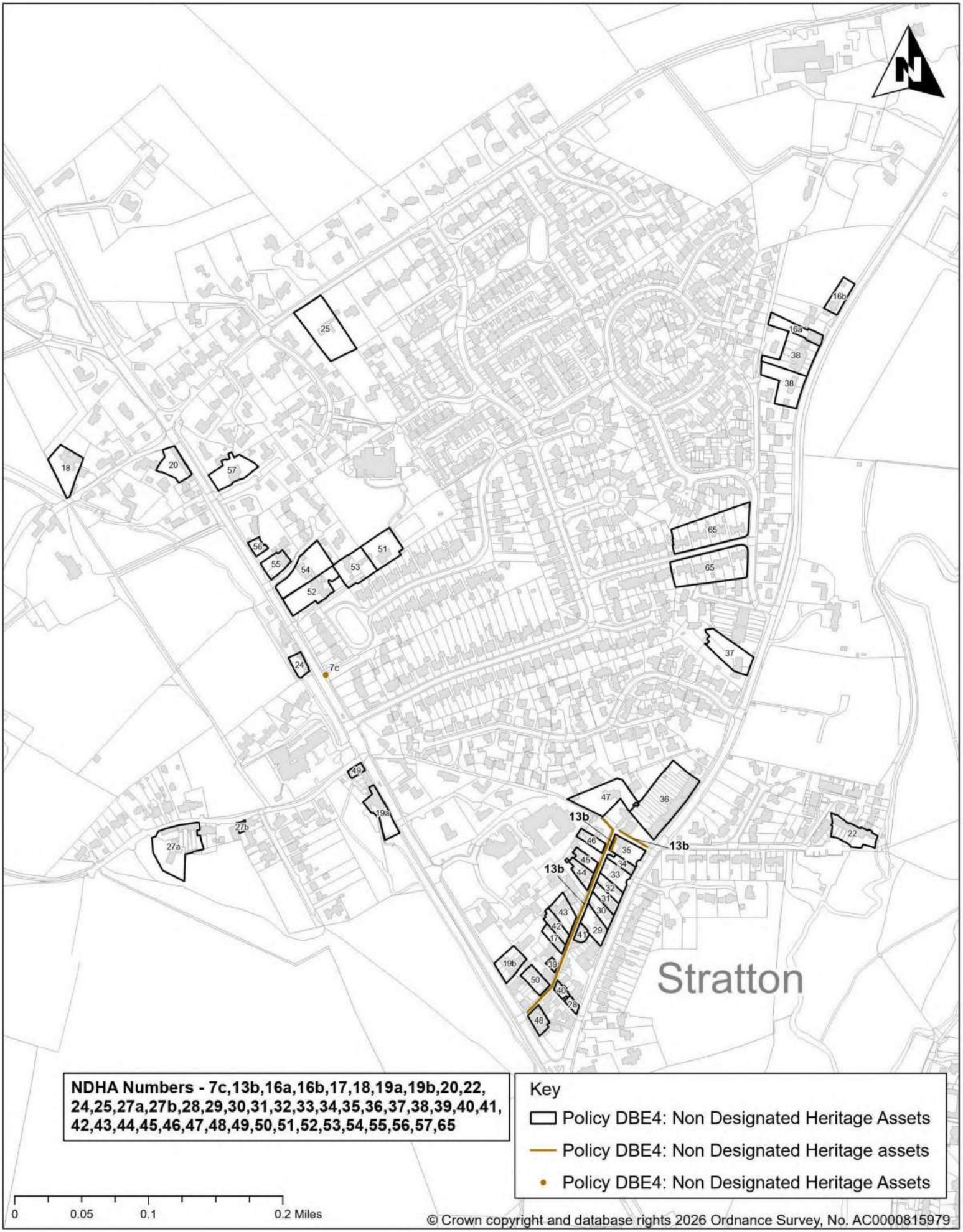
COTSWOLD District Council



Cirencester Parish Neighbourhood Development Plan

Policy DBE4: Non Designated Heritage Assets - OVERVIEW MAP

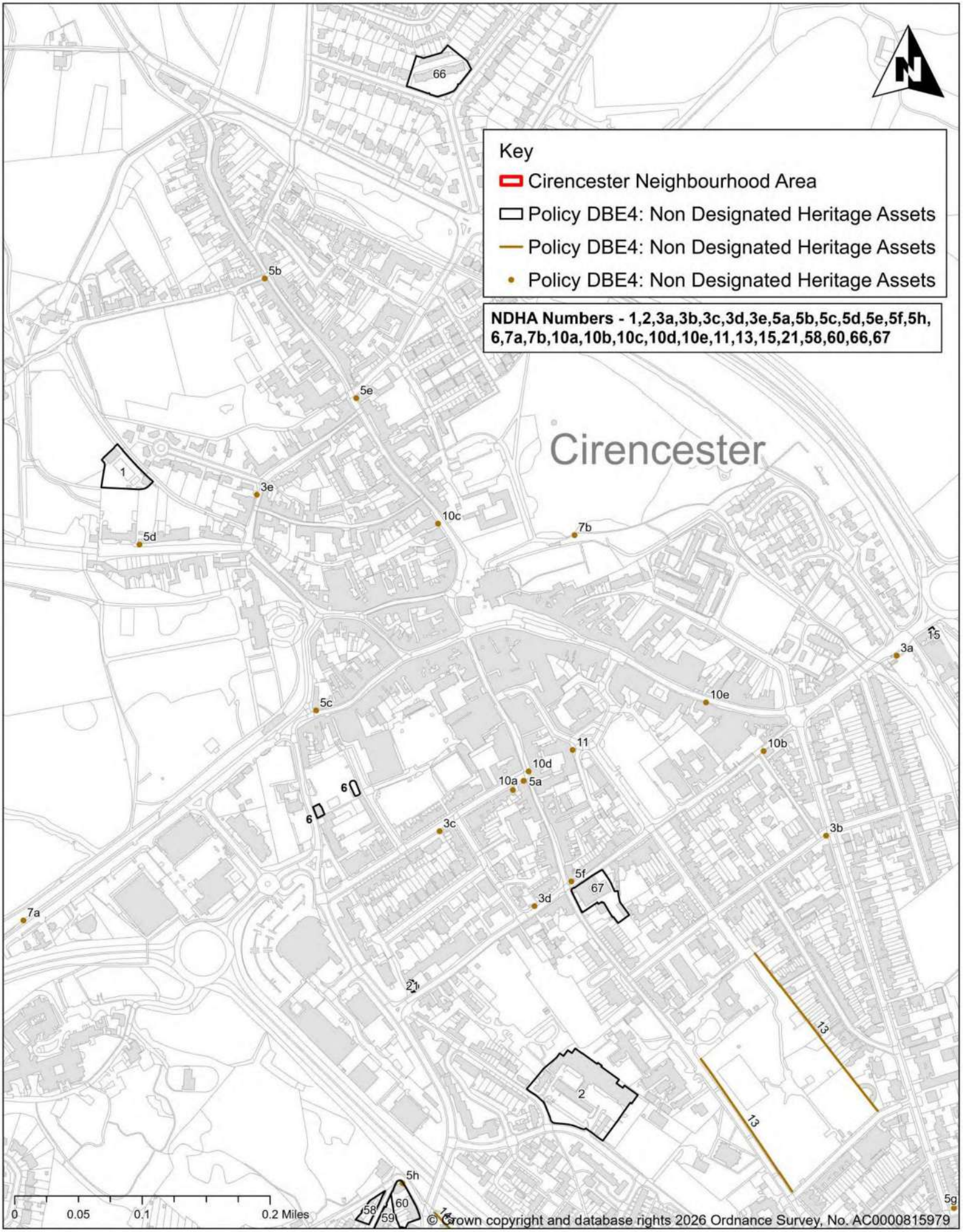
COTSWOLD District Council



Cirencester Parish Neighbourhood Development Plan

Policy DBE4: Non Designated Heritage Assets - MAP1

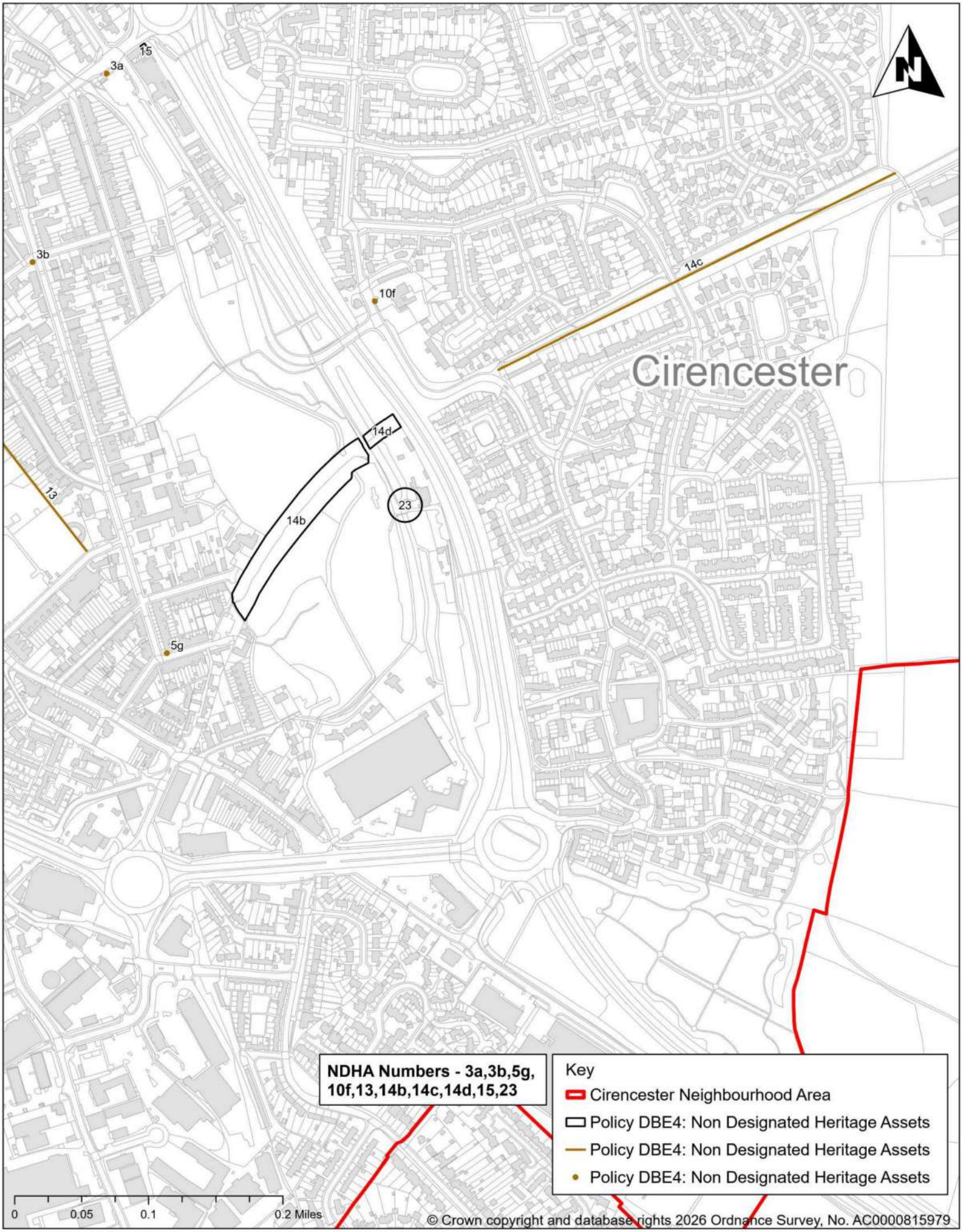
COTSWOLD District Council



Cirencester Parish Neighbourhood Development Plan

Policy DBE4: Non Designated Heritage Assets - MAP2

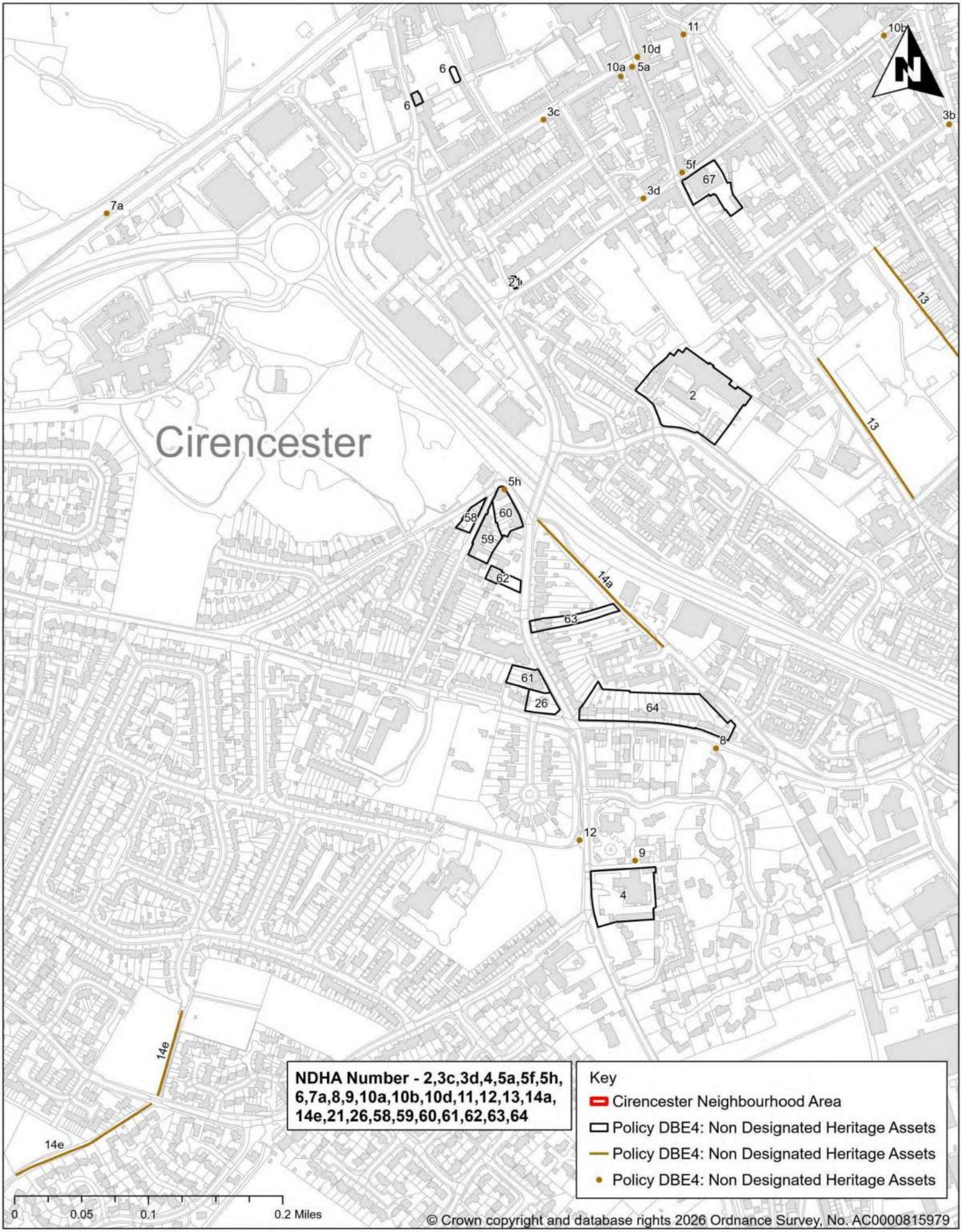
COTSWOLD District Council



Cirencester Parish Neighbourhood Development Plan

Policy DBE4: Non Designated Heritage Assets - MAP3

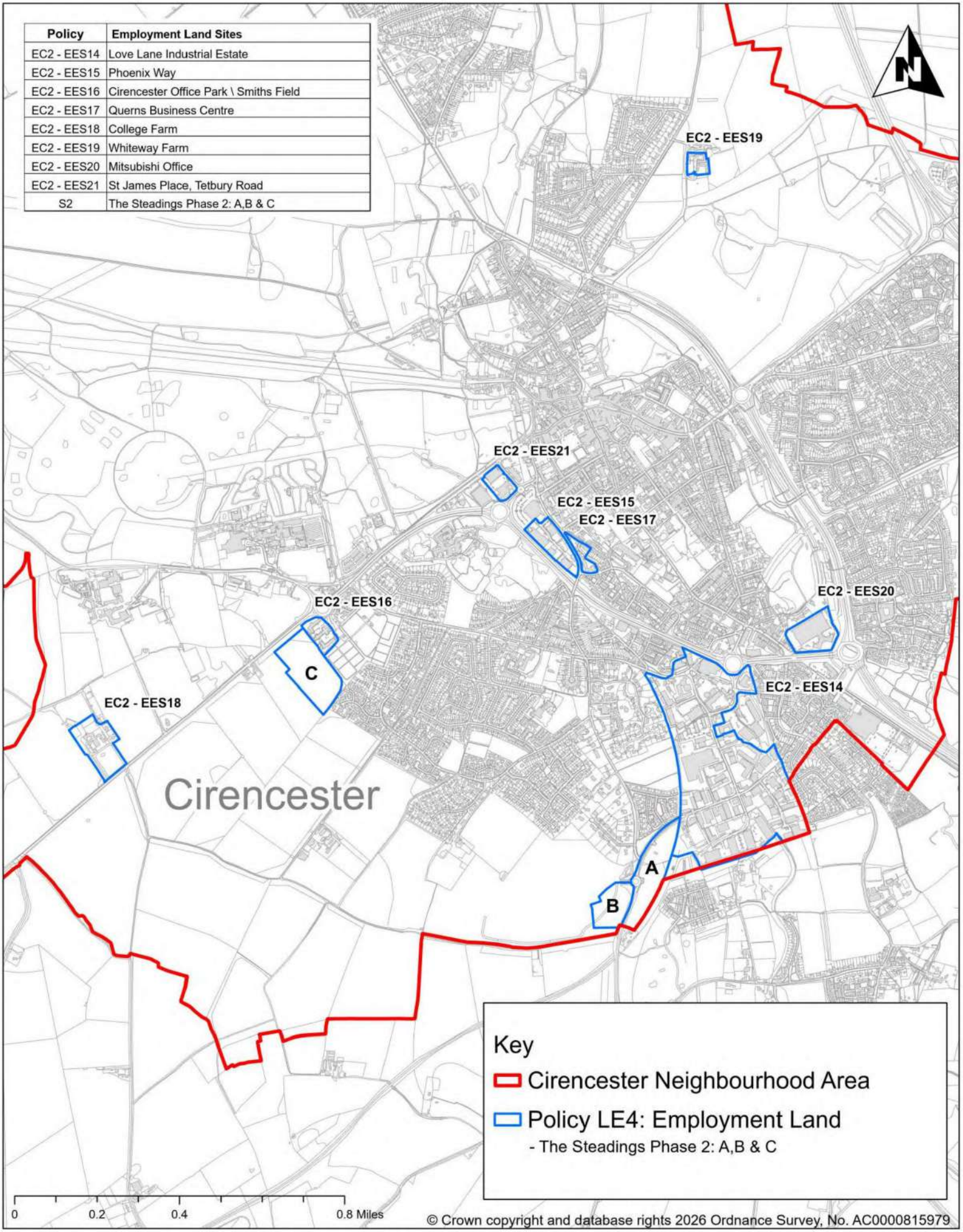
COTSWOLD District Council



Cirencester Parish Neighbourhood Development Plan

Policy DBE4: Non Designated Heritage Assets - MAP4

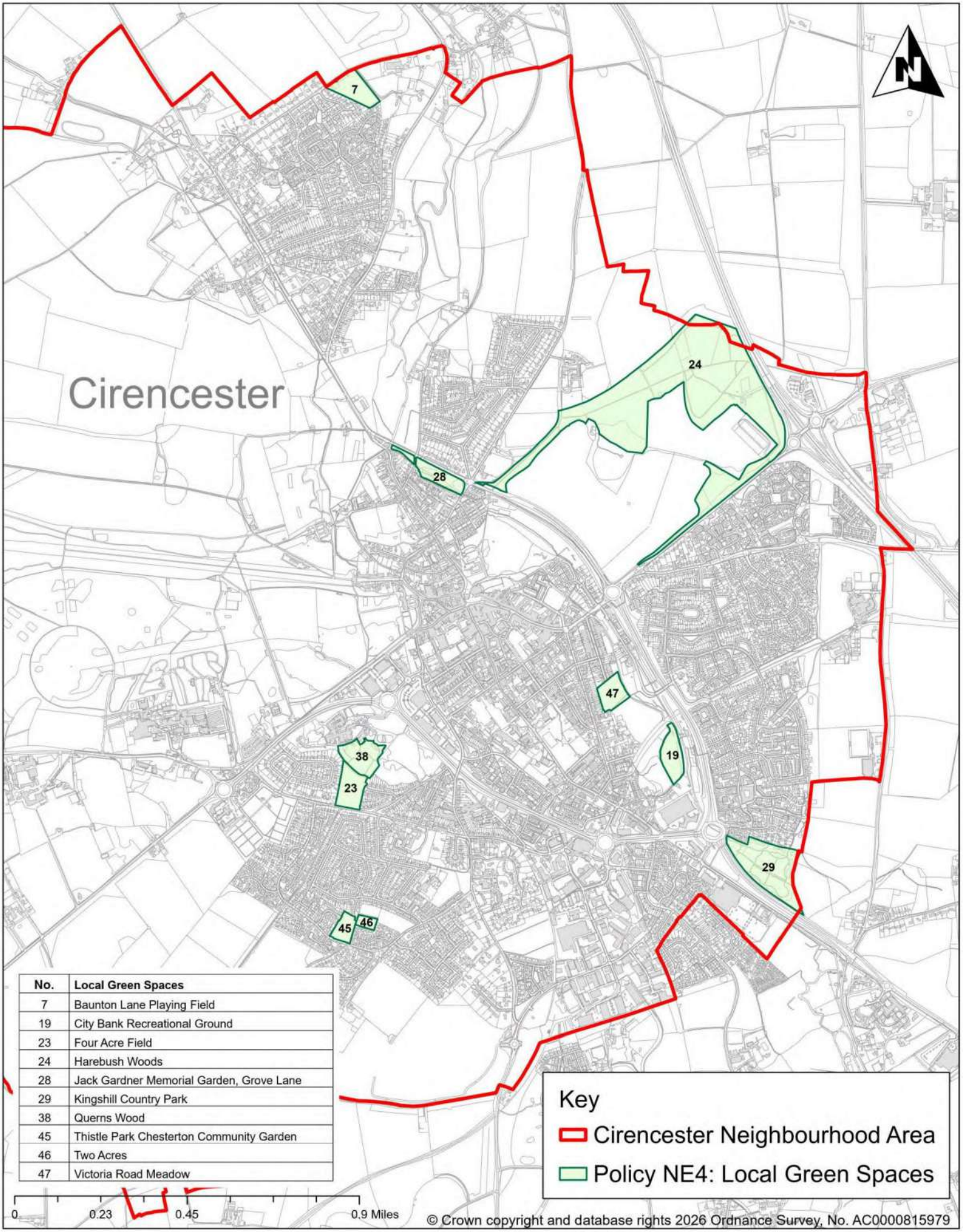
COTSWOLD District Council



Cirencester Parish Neighbourhood Development Plan

Policy LE4: Employment Land

COTSWOLD District Council



No.	Local Green Spaces
7	Baunton Lane Playing Field
19	City Bank Recreational Ground
23	Four Acre Field
24	Harebush Woods
28	Jack Gardner Memorial Garden, Grove Lane
29	Kingshill Country Park
38	Querns Wood
45	Thistle Park Chesterton Community Garden
46	Two Acres
47	Victoria Road Meadow

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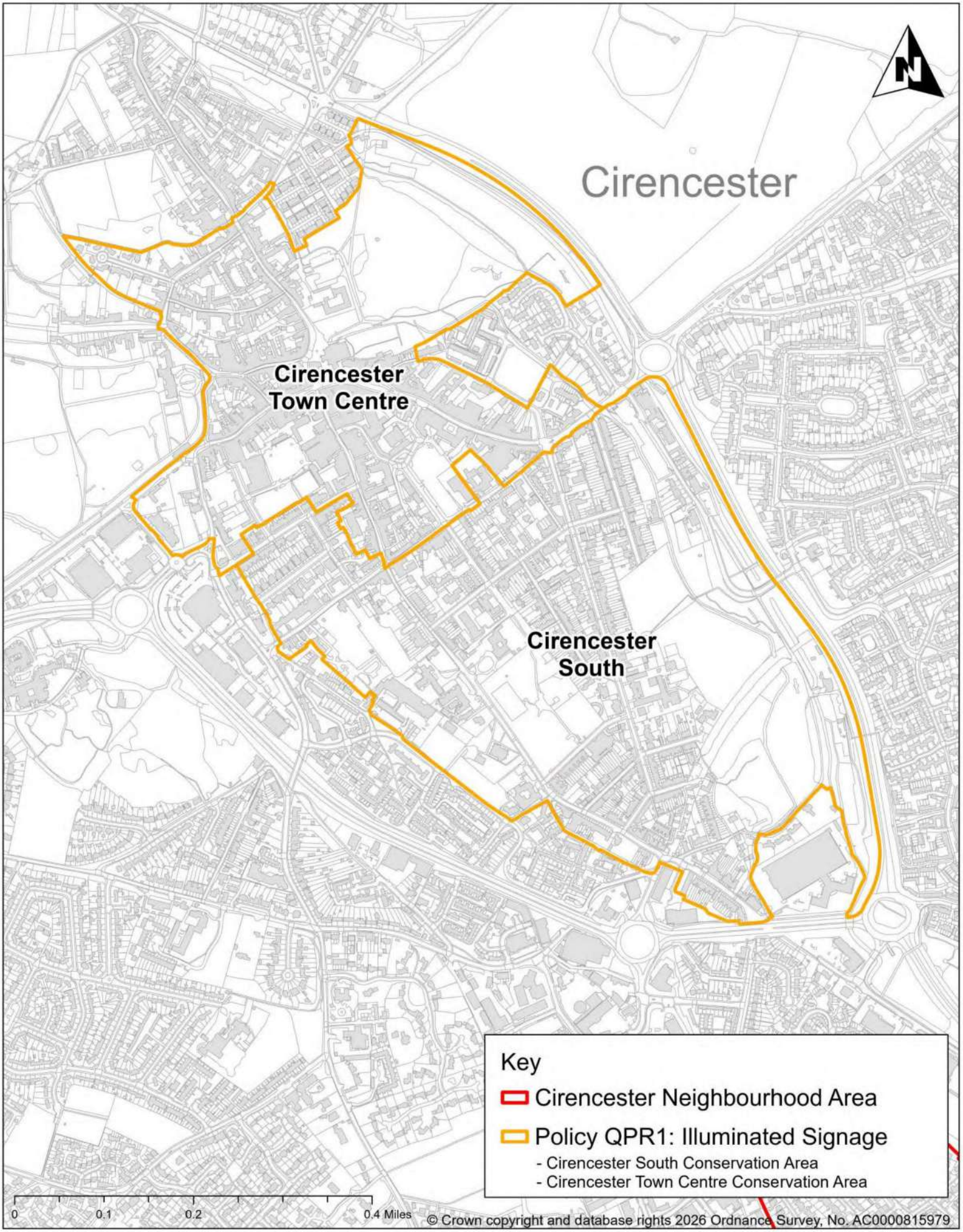
Cirencester Parish Neighbourhood Development Plan

Policy NE4: Local Green Spaces

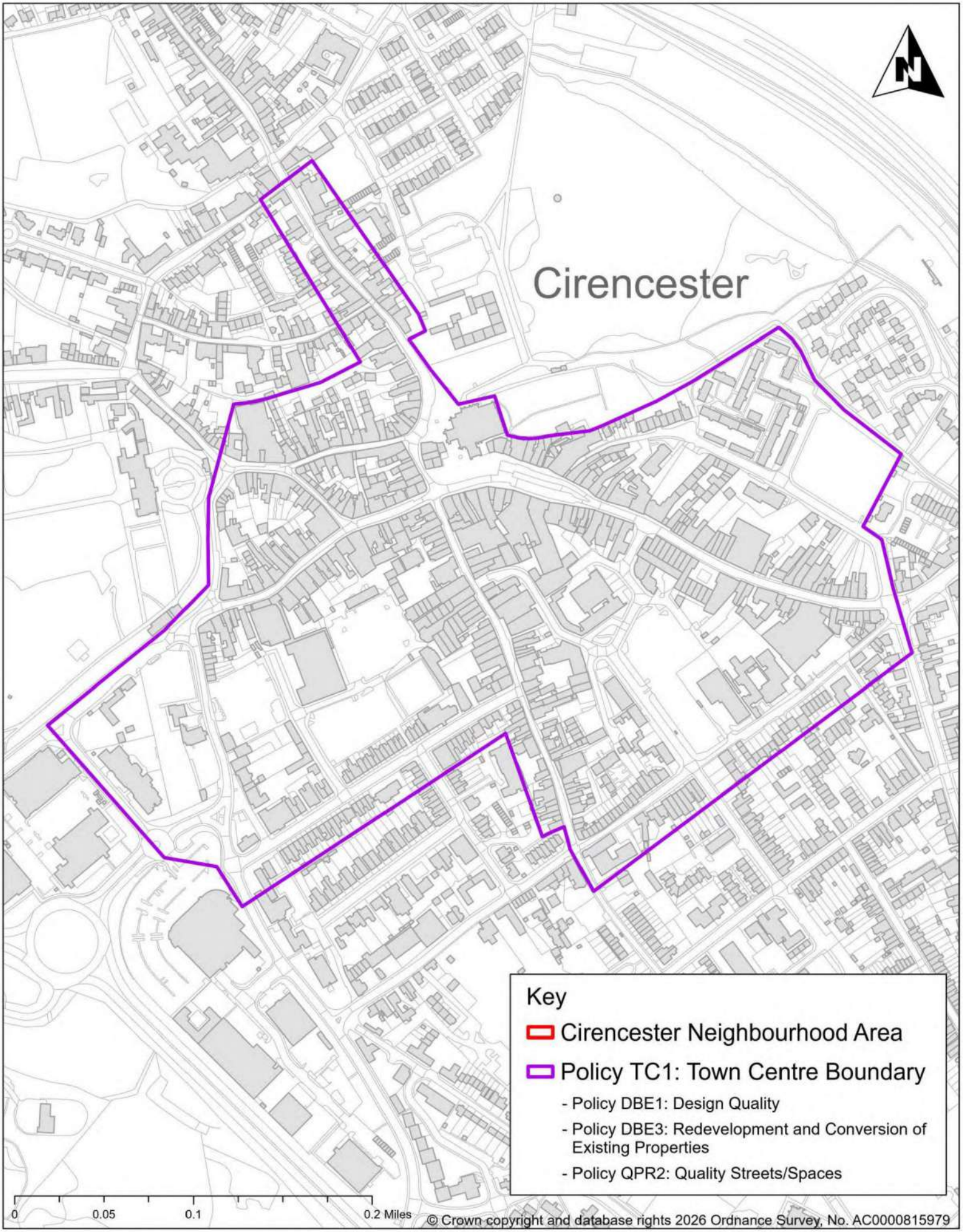
COTSWOLD District Council



Cirencester Parish Neighbourhood Development Plan

Policy QPR1: Illuminated Signage

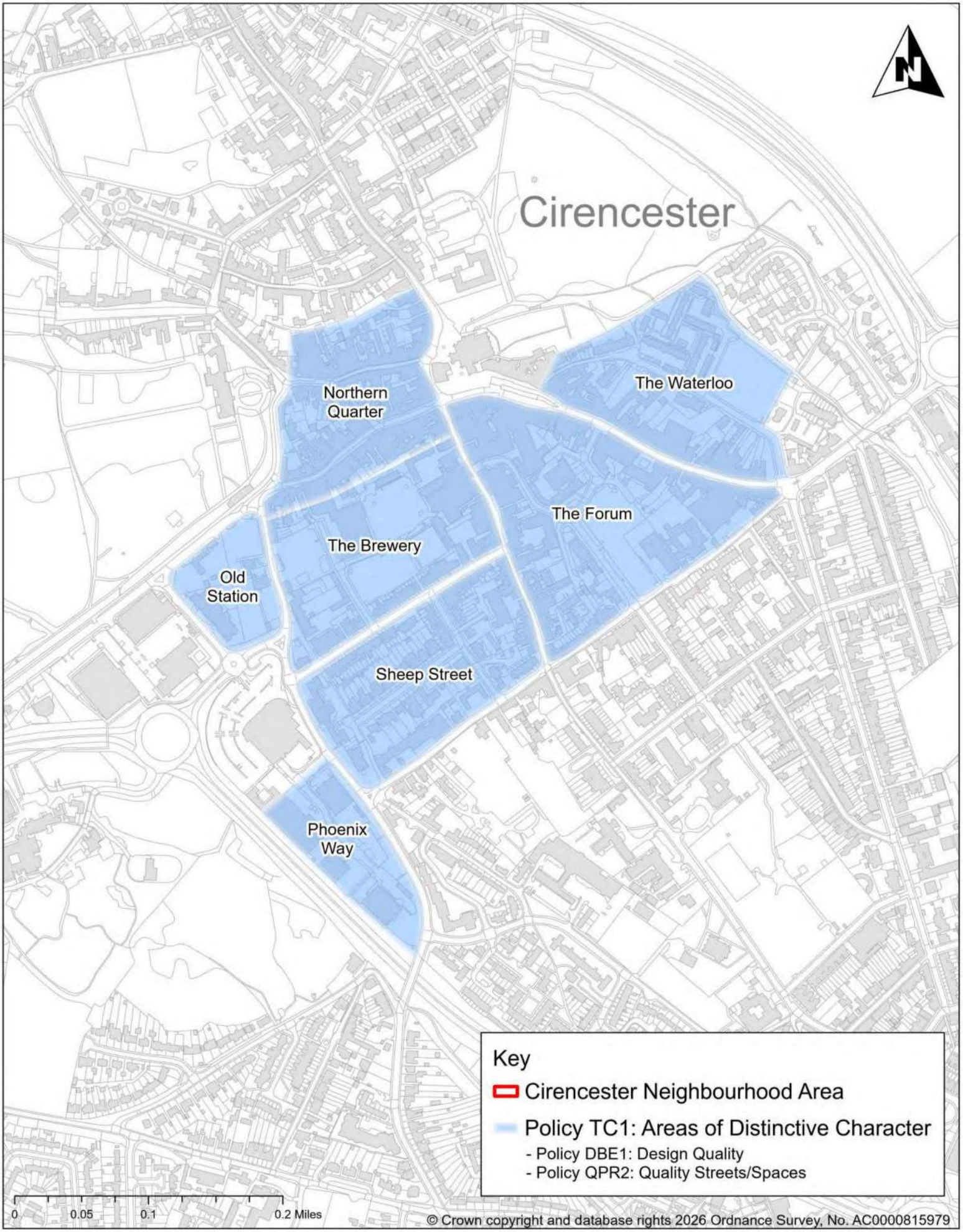
COTSWOLD District Council



Cirencester Parish Neighbourhood Development Plan

Policy TC1: Town Centre Boundary

COTSWOLD District Council



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Cirencester Parish Neighbourhood Development Plan

Policy TC1: Areas of Distinctive Character

COTSWOLD District Council

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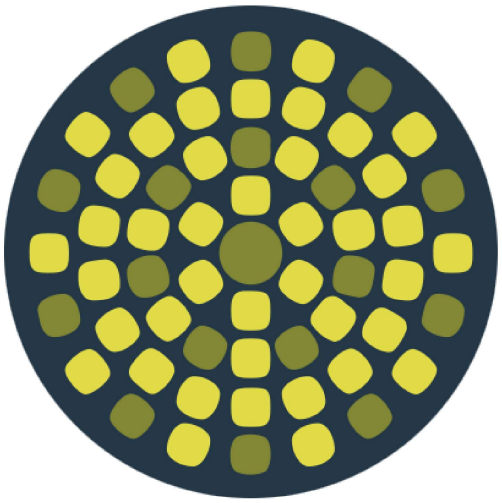
CIRENCESTER NEIGHBOURHOOD PLAN



BASIC CONDITIONS STATEMENT

November 2024

CIRENCESTER NEIGHBOURHOOD PLAN

BASIC CONDITIONS STATEMENT

Introduction

This Basic Conditions Statement (BCS) has been prepared by Cirencester Town Council to accompany its submission of the Cirencester Neighbourhood Plan to Cotswold District Council (CDC) under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

The Neighbourhood Plan has been prepared by the Town Council, which is the 'Qualifying Body' as defined by the regulations. The designated Neighbourhood Area covers the entire parished area of Cirencester as approved by CDC in October 2018.

Context

The Cirencester Neighbourhood Plan sets out a vision for the town from 2011 to 2031 and includes a range of policies on the development and use of land. These policies have been developed through extensive consultation with the local community and stakeholders, ensuring that the plan reflects the aspirations and needs of the town.

Legislative Framework

The preparation of the Cirencester Neighbourhood Plan has been guided by the following national and local regulations and policies:

National Regulations

1. *Neighbourhood Planning (General) Regulations 2012 (as amended):* These regulations set out the procedures for the preparation of neighbourhood plans, including the requirements for consultation, submission, and examination.
2. *National Planning Policy Framework (NPPF):* The NPPF provides a framework within which local plans and neighbourhood plans are prepared. It emphasises the importance of sustainable development, community engagement, and the alignment of neighbourhood plans with strategic policies. NPPF has recently been revised and a draft version is currently being consulted upon. For the purposes of this BCS, the adopted version, dated December 2023 has been used.

Local Plan Policies

1. *Cotswold District Local Plan 2011-2031:* The Local Plan, adopted on 3 August 2018, provides the strategic context for the Neighbourhood Plan. It includes policies on housing, employment, environment, and infrastructure that the Cirencester Neighbourhood Plan must be in general conformity with.
2. *Supplementary Planning Documents (SPDs):* These documents provide additional guidance on specific topics such as affordable housing and design, which have been considered in the preparation of the Cirencester Neighbourhood Plan. Key documents in this category include a Design Code for the public realm of Cirencester, as prepared by Cirencester Town Council (2017) and the Cotswold Design Code, which is Appendix D in the adopted Cotswold Local Plan (2018).

The Basic Conditions

The Neighbourhood Plan must meet the following basic conditions as set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990:

1. *Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the Neighbourhood Plan.*
2. *The making of the Neighbourhood Plan contributes to the achievement of sustainable development.*
3. *The making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
4. *The making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations.*

Community Engagement

Community engagement has been a cornerstone of the Cirencester Neighbourhood Plan process. The Town Council has undertaken a comprehensive programme of consultation to ensure that the views and needs of local residents, businesses, and stakeholders are fully reflected in the plan. Key activities included:

1. *Public Meetings & Workshops:* A series of public meetings and workshops were held to gather initial ideas and feedback on draft policies.
2. *Surveys & Questionnaires:* Residents were invited to complete surveys and questionnaires to provide detailed input on specific issues and priorities.
3. *Focus Groups:* Focus groups were conducted with key stakeholder groups, including local businesses, community organisations, and youth representatives.
4. *Consultation Events:* Drop-in sessions and exhibitions were organised to present draft proposals and gather further feedback.

5. *Online Engagement:* A dedicated website and social media channels were used to share information and updates, and to collect comments and suggestions from the wider community.

The feedback received from these activities has been instrumental in shaping the Cirencester Neighbourhood Plan, ensuring that it addresses the key concerns and aspirations of the local community. Full details of all the consultation activities can be found in the accompanying Consultation Statement.

Incorporation of Community Engagement Results

The results gathered from community engagement activities was reviewed and analysed to ensure that the Cirencester Neighbourhood Plan accurately reflects the priorities and concerns of residents. Here are some examples of how policy areas were shaped by community input:

1. Environment & Green Spaces:
    - *Community Feedback:* There was significant support for the protection and enhancement of local green spaces and biodiversity.
    - *Policy Response:* Policies were developed to safeguard existing green spaces, promote the creation of new ones, and enhance biodiversity through specific measures such as tree planting and habitat restoration.
2. Transport & Infrastructure:
    - *Community Feedback:* Concerns were raised about traffic congestion and the need for improved public transport and cycling infrastructure.
    - *Policy Response:* The Cirencester Neighbourhood Plan includes policies aimed at improving public transport links, enhancing cycling and walking routes, and implementing measures to reduce congestion and improve road safety.
3. Local Economy:
    - *Community Feedback:* Residents highlighted the importance of supporting local businesses and creating job opportunities within the town.
    - *Policy Response:* Policies were introduced to encourage the development of small business units, support home-based businesses, and promote local markets and events to boost the local economy.

4. Heritage & Design:

    - *Community Feedback:* The community emphasised the need to preserve the town's historic character and ensure new developments are in keeping with the local architectural style.
    - *Policy Response:* Design guidelines were established to ensure that new developments respect the historic character of the town, with specific criteria for building materials, styles, and layouts.

By incorporating this feedback, the Cirencester Neighbourhood Plan aims to create a balanced and sustainable framework for the future development of the town, ensuring that it meets the needs and aspirations of the community.

Schedule of Planning Policies contained in the Submission Plan

- POLICY TC1 – TOWN CENTRE AND AREAS OF DISTINCTIVE CHARACTER
- POLICY AM 1 – THE CIRENCESTER SPOKE & WHEEL CYCLE AND FOOTPATH NETWORK
- POLICY AM 2 – TOWN & COUNTRY CONNECTIONS
- POLICY AM 3 – THE PEDESTRIAN EXPERIENCE
- POLICY AM4 – INTEGRATED MOBILITY HUB
- POLICY AM5 – STRATEGIC CONNECTIONS & TRANSPORT LINKS
- POLICY AM6 – SUSTAINABLE AND ACTIVE TRAVEL
- POLICY DBE1 – DESIGN QUALITY
- POLICY DBE2 – PROTECTION OF LANDSCAPE & TOWNSCAPE VIEWS
- POLICY DBE3 – REDEVELOPMENT AND CONVERSION OF EXISTING PROPERTIES
- POLICY DBE4 – PROTECTION OF NON-DESIGNATED HERITAGE ASSETS
- POLICY DBE5 – NET-ZERO & ENERGY EFFICIENCY MEASURES IN THE DESIGN & CONSTRUCTION PROCESS
- POLICY DBE6 – ENERGY USE IN NEW BUILDINGS
- POLICY DBE7 – HOMES IN MULTIPLE OCCUPATION
- POLICY QPR1 – ILLUMINATED SIGNAGE
- POLICY QPR2 – QUALITY STREETS & SPACES
- POLICY QPR3 – SOCIAL & CIVIC SPACES
- POLICY QPR4 – HERITAGE TRAILS & WAYFINDING SYSTEMS
- POLICY TMN1 – 20 MINUTE NEIGHBOURHOODS
- POLICY NE1 – NATURAL AND SEMI-NATURAL HABITAT SCHEMES
- POLICY NE2 – WILDLIFE CORRIDORS
- POLICY NE3 – GREEN INFRASTRUCTURE PROTECTION & ENHANCEMENT
- POLICY NE4 – LOCAL GREEN SPACE DESIGNATIONS
- POLICY NE5 – GREEN GAPS
- POLICY LE1 – PROTECT & ENHANCE ECONOMIC ACTIVITY
- POLICY LE2 – PROVISION FOR INNOVATIVE WORK SPACES, NEW & SMALL BUSINESSES
- POLICY LE3 – SKILLS DEVELOPMENT
- POLICY LE4 – NEW EMPLOYMENT PREMISES & DESIGN QUALITY
- POLICY WBC1 – AIR QUALITY
- POLICY WBC2 – EQUAL ACCESS TO PUBLIC OPEN SPACES FOR ALL
- POLICY WBC3 – ACCESS TO PLAY SPACES
- POLICY WBC4 – COMMUNITY FACILITIES
- POLICY WBC5 – DESIGNING OUT CRIME
- POLICY WBC6 – LIGHT POLLUTION
- POLICY WBC7 – NOISE POLLUTION

Set out over the following pages, is the relationship between the 35 Cirencester Neighbourhood Plan policies (above) and as contained in the submission version of the plan, and the NPPF (December 2023) and the adopted Cotswold District Local Plan (2018).

POLICY TC1 – TOWN CENTRE AND AREAS OF DISTINCTIVE CHARACTER

National Planning Policy Framework (NPPF) December 2023

1. **Ensuring the Vitality of Town Centres** (Paragraphs 90-95)
    - Focuses on defining a network and hierarchy of town centres, promoting their long-term vitality and viability by allowing them to grow and diversify.
2. **Building a Strong, Competitive Economy** (Paragraphs 85-89)
    - Supports economic growth and productivity, which includes the role of town centres in providing employment and business opportunities.
3. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Encourages the provision of community facilities and services within town centres to support social interaction and community well-being.
4. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of good design in town centres to create attractive, accessible, and functional spaces.

Cotswold District Council Local Plan (2018)

1. **Policies EC7 and EC8: Town and Local Centres**
    - Supports the development and enhancement of town and local centres, ensuring they remain vibrant and viable.
2. **Policy DS1: Development Strategy**
    - Guides the overall development strategy, including the role of town centres in providing a mix of uses and supporting economic growth**.**
3. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments in town centres to be of high quality and contribute positively to the character and appearance of the area.
4. **Policy INF2: Social and Community Infrastructure**
    - Supports the provision of social and community infrastructure within town centres to enhance their role as community hubs.

These policies and paragraphs ensure that town centres in Cotswold District, such as Cirencester are supported and enhanced, maintaining their role as vibrant and sustainable hubs for the community.

POLICY AM 1 – THE CIRENCESTER SPOKE & WHEEL CYCLE AND FOOTPATH NETWORK

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Sustainable Transport** (Paragraphs 108-117)
    - Prioritises pedestrian and cycle movements within new developments and connections to neighbouring areas.
    - Encourages the provision of high-quality walking and cycling infrastructure to promote sustainable transport choices.
2. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Supports the creation of safe and accessible routes for walking and cycling to enhance community health and well-being.
3. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of integrating walking and cycling routes into the design of new developments to create attractive and functional spaces.

Cotswold District Council Local Plan (2018)

1. **Policy INF3: Sustainable Transport**
    - Promotes the development of walking and cycling networks to reduce reliance on car travel and support sustainable transport.
2. **Policy INF7: Green Infrastructure**
    - Encourages the integration of walking and cycling routes within green infrastructure networks to enhance accessibility and recreational opportunities.
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for walking and cycling infrastructure, ensuring they are integrated into new developments and accessible to residents.
4. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to consider the needs of pedestrians and cyclists in their design, promoting safe and convenient access.

These policies and paragraphs aim to promote walking and cycling as sustainable and healthy modes of transport, ensuring that new developments are designed to support these activities.

POLICY AM 2 – TOWN & COUNTRY CONNECTIONS

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Sustainable Transport** (Paragraphs 108-117)
    - Prioritizes pedestrian and cycle movements within new developments and connections to neighbouring areas.
    - Encourages the provision of high-quality walking and cycling infrastructure to promote sustainable transport choices.
2. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Supports the creation of safe and accessible routes for walking and cycling to enhance community health and well-being.
3. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of integrating walking and cycling routes into the design of new developments to create attractive and functional spaces.

Cotswold District Council Local Plan (2018)

1. **Policy INF3: Sustainable Transport**
    - Promotes the development of walking and cycling networks to reduce reliance on car travel and support sustainable transport.
2. **Policy INF7: Green Infrastructure**
    - Encourages the integration of walking and cycling routes within green infrastructure networks to enhance accessibility and recreational opportunities.
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for walking and cycling infrastructure, ensuring they are integrated into new developments and accessible to residents.
4. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to consider the needs of pedestrians and cyclists in their design, promoting safe and convenient access.

These policies and paragraphs ensure that connections are integral parts of the planning and development process, promoting healthier and more sustainable communities, even in rural areas.

POLICY AM 3 – THE PEDESTRIAN EXPERIENCE

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Sustainable Transport** (Paragraphs 108-117)
    - Prioritises pedestrian movements within new developments and connections to neighbouring areas.
    - Encourages the provision of high-quality walking infrastructure to promote sustainable transport choices.
2. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Supports the creation of safe and accessible routes for walking to enhance community health and well-being.
3. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of integrating walking routes into the design of new developments to create attractive and functional spaces.

Cotswold District Council Local Plan

1. **Policy INF3: Sustainable Transport**
    - Promotes the development of walking networks to reduce reliance on car travel and support sustainable transport.
2. **Policy INF7: Green Infrastructure**
    - Encourages the integration of walking routes within green infrastructure networks to enhance accessibility and recreational opportunities**.**
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for walking infrastructure, ensuring they are integrated into new developments and accessible to residents.
4. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to consider the needs of pedestrians in their design, promoting safe and convenient access.

These policies and paragraphs aim to promote walking as a sustainable and healthy mode of transport, ensuring that new developments are designed to support pedestrian movement.

POLICY AM4 – INTEGRATED MOBILITY HUB

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Sustainable Transport** (Paragraphs 108-117)
    - Prioritises the development of high-quality public transport systems and encourages layouts that maximise the catchment area for bus or other public transport services.
    - Supports the integration of public transport facilities into new developments to promote sustainable transport choices.
2. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Encourages the provision of public transport options to enhance community health and well-being.
3. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of integrating public transport facilities into the design of new developments to create attractive and functional spaces.

Cotswold District Council Local Plan

1. **Policy INF3: Sustainable Transport**
    - Promotes the development of public transport networks to reduce reliance on car travel and support sustainable transport.
2. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for public transport infrastructure, ensuring it is integrated into new developments and accessible to residents.
3. **Policy INF7: Green Infrastructure**
    - Encourages the integration of public transport routes within green infrastructure networks to enhance accessibility and reduce environmental impact.

These policies and paragraphs aim to promote public transport as a sustainable and efficient mode of transport, ensuring that new developments are designed to support and enhance public transport options.

POLICY AM5 – STRATEGIC CONNECTIONS & TRANSPORT LINKS

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Sustainable Transport** (Paragraphs 108-117)
    - Emphasises the importance of strategic transport links to support sustainable development and economic growth.
    - Encourages the development of transport infrastructure that connects key economic areas and supports the movement of goods and people efficiently.
2. **Building a Strong, Competitive Economy** (Paragraphs 85-89)
    - Highlights the role of strategic transport links in enhancing productivity and supporting economic growth.
3. **Meeting the Challenge of Climate Change, Flooding, and Coastal Change** (Paragraphs 157-179)
    - Supports the development of transport infrastructure that contributes to reducing greenhouse gas emissions and managing climate change impacts.

Cotswold District Council Local Plan

1. **Policy INF1: Strategic Infrastructure Delivery**
    - Focuses on the delivery of strategic transport infrastructure to support sustainable development and economic growth.
2. **Policy INF3: Sustainable Transport**
    - Promotes the development of strategic transport links to reduce reliance on car travel and support sustainable transport options.
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for strategic transport links, ensuring they are integrated into new developments and accessible to residents.

These policies and paragraphs aim to ensure that strategic transport links are developed to support sustainable growth, enhance connectivity, and contribute to environmental sustainability.

POLICY AM6 – SUSTAINABLE AND ACTIVE TRAVEL

National Planning Policy Framework (NPPF) December 2023

4. **Promoting Sustainable Transport** (Paragraphs 108-117)
    - Prioritises pedestrian and cycle movements within new developments and connections to neighbouring areas.
    - Encourages the provision of high-quality walking and cycling infrastructure to promote sustainable transport choices.
5. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Supports the creation of safe and accessible routes for walking and cycling to enhance community health and well-being.
6. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of integrating walking and cycling routes into the design of new developments to create attractive and functional spaces.

Cotswold District Council Local Plan (2018)

5. **Policy INF3: Sustainable Transport**
    - Promotes the development of walking and cycling networks to reduce reliance on car travel and support sustainable transport.
6. **Policy INF7: Green Infrastructure**
    - Encourages the integration of walking and cycling routes within green infrastructure networks to enhance accessibility and recreational opportunities.
7. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for walking and cycling infrastructure, ensuring they are integrated into new developments and accessible to residents.
8. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to consider the needs of pedestrians and cyclists in their design, promoting safe and convenient access.

These policies and paragraphs aim to promote walking and cycling as sustainable and healthy modes of transport, ensuring that new developments are designed to support these activities.

POLICY DBE1 – DESIGN QUALITY

National Planning Policy Framework (NPPF) December 2023

1. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of high-quality, beautiful, and sustainable design in new developments.
    - Encourages the preparation of design guides and codes to set clear design expectations.
    - Highlights the role of effective community engagement in the design process.
2. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Supports the creation of safe, inclusive, and accessible environments through good design.
3. **Building a Strong, Competitive Economy** (Paragraphs 85-89)
    - Encourages well-designed commercial and industrial developments to support economic growth.

Cotswold District Council Local Plan (2018)

1. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to be of high quality and to respect the character and appearance of the area.
2. **Policy DS1: Development Strategy**
    - Guides the overall development strategy, including design quality considerations for new developments.
3. **Policy EN4: The Wider Natural and Historic Environment**
    - Ensures that new developments contribute positively to the natural and historic environment through good design.
4. **Cotswold Design Code**
    - Provides detailed guidance on achieving good design in the district, covering architectural styles, materials, and green infrastructure.

These policies and paragraphs aim to ensure that new developments are well-designed, enhancing the quality of life for residents and contributing positively to the character of the area.

POLICY DBE2 – PROTECTION OF LANDSCAPE & TOWNSCAPE VIEWS

National Planning Policy Framework (NPPF) December 2023

1. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of good design in protecting and enhancing valued landscapes and views.
2. **Conserving and Enhancing the Natural Environment** (Paragraphs 180-194)
    - Focuses on protecting and improving the natural environment, including the protection of important views and landscapes.
3. **Conserving and Enhancing the Historic Environment** (Paragraphs 195-208)
    - Highlights the need to protect views that contribute to the significance of heritage assets.

Cotswold District Council Local Plan (2018)

1. **Policy EN4: The Wider Natural and Historic Environment**
    - Ensures that new developments do not adversely affect important views and landscapes.
2. **Policy EN5: Cotswold Area of Outstanding Natural Beauty (AONB)**
    - Protects the scenic beauty and views within the Cotswold AONB.
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include considerations for protecting important views and landscapes.
4. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to respect and enhance the character and appearance of the area, including the protection of key views.

These policies and paragraphs aim to ensure that important views and landscapes are protected and enhanced through careful planning and design.

POLICY DBE3 – REDEVELOPMENT AND CONVERSION OF EXISTING PROPERTIES

National Planning Policy Framework (NPPF) December 2023

1. **Making Effective Use of Land** (Paragraphs 123-130)
    - Encourages the conversion of existing buildings to support the efficient use of land and meet housing and economic needs.
2. **Building a Strong, Competitive Economy** (Paragraphs 85-89)
    - Supports the conversion of existing properties for business use to enhance economic growth and productivity.
3. **Conserving and Enhancing the Historic Environment** (Paragraphs 195-208)
    - Promotes the sensitive conversion of historic buildings to maintain their significance while allowing for adaptive reuse.

Cotswold District Council Local Plan (2018)

1. **Policy EC6: Conversion of Rural Buildings**
    - Supports the conversion of rural buildings for employment, tourism, and community uses, ensuring that conversions are sympathetic to the character of the building and its surroundings.
2. **Policy H4: Housing Development and Conversion**
    - Encourages the conversion of existing buildings to residential use, particularly where it contributes to meeting local housing needs.
3. **Policy EN2: Design of the Built and Natural Environment**
    - Requires that conversions respect the character and appearance of the existing building and its setting.
4. **Policy EN10 & EN13: Historic Environment**
    - Ensures that the conversion of historic buildings preserves their significance and contributes positively to the historic environment.

These policies and paragraphs aim to facilitate the conversion of existing properties in a way that supports sustainable development, economic growth, and the preservation of historic and rural character.

POLICY DBE4 – PROTECTION OF NON-DESIGNATED HERITAGE ASSETS

National Planning Policy Framework (NPPF) December 2023

1. **Conserving and Enhancing the Historic Environment** (Paragraphs 195-208)
    - Specifically addresses the protection of non-designated heritage assets, emphasising their conservation and enhancement.
    - Paragraph 209 highlights that non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

Cotswold District Council Local Plan (2018)

1. **Policy EN12: Historic Environment**
    - Focuses on the protection and enhancement of non-designated heritage assets, ensuring that their significance is taken into account in planning decisions.
2. **Policy EN10: Historic Environment**
    - Ensures that the conservation of non-designated heritage assets is considered in the planning process, promoting their retention and appropriate reuse.
3. **Policy EN2: Design of the Built and Natural Environment**
    - Requires that new developments respect and enhance the character and appearance of the area, including the protection of non-designated heritage assets.

These policies and paragraphs aim to ensure that non-designated heritage assets are protected, and their significance is considered in planning decisions.

POLICY DBE5 – NET-ZERO & ENERGY EFFICIENCY MEASURES IN THE DESIGN & CONSTRUCTION PROCESS

National Planning Policy Framework (NPPF) December 2023

1. **Meeting the Challenge of Climate Change, Flooding, and Coastal Change** (Paragraphs 157-179)
    - Emphasises the importance of planning for climate change mitigation and adaptation, including the promotion of energy efficiency and the transition to a low-carbon future.
    - Paragraph 164 specifically requires local authorities to give significant weight to the need to support energy efficiency and low carbon heating improvements.
2. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Encourages the integration of energy efficiency measures into the design of new developments to create sustainable and resilient communities.
3. **Building a Strong, Competitive Economy** (Paragraphs 85-89)
    - Supports the development of green industries and technologies, including energy-efficient construction practices.

Cotswold District Council Local Plan (2018)

1. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to incorporate sustainable design principles, including energy efficiency measures.
2. **Policy INF10: Renewable Energy**
    - Supports the development of renewable energy projects and the integration of renewable energy technologies into new developments.
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for energy efficiency and sustainable construction practices.
4. **Policy INF10 & Net Zero Carbon Toolkit (Cotswold District)**
    - Provides detailed guidance on achieving net-zero carbon homes, covering all stages of the build process from pre-planning to construction.

These policies and paragraphs aim to promote energy efficiency and support the transition to a low-carbon future through sustainable design and construction practices.

POLICY DBE6 – ENERGY USE IN NEW BUILDINGS

National Planning Policy Framework (NPPF) December 2023

1. **Meeting the Challenge of Climate Change, Flooding, and Coastal Change** (Paragraphs 157-179)
    - Emphasises the importance of planning for climate change mitigation and adaptation, including the promotion of energy efficiency and the transition to a low-carbon future.
    - Paragraph 164 specifically requires local authorities to give significant weight to the need to support energy efficiency and low carbon heating improvements.
2. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Encourages the integration of energy efficiency measures into the design of new developments to create sustainable and resilient communities.
3. **Building a Strong, Competitive Economy** (Paragraphs 85-89)
    - Supports the development of green industries and technologies, including energy-efficient construction practices.

Cotswold District Council Local Plan (2018)

1. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to incorporate sustainable design principles, including energy efficiency measures.
2. **Policy INF10: Renewable Energy**
    - Supports the development of renewable energy projects and the integration of renewable energy technologies into new developments.
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for energy efficiency and sustainable construction practices.
4. **Policy INF10 & the Net Zero Carbon Toolkit (Cotswold District)**
    - Provides detailed guidance on achieving net-zero carbon homes, covering all stages of the build process from pre-planning to construction.

These policies and paragraphs aim to promote energy efficiency and support the transition to a low-carbon future through sustainable design and construction practices.

POLICY DBE7 – HOMES IN MULTIPLE OCCUPATION

National Planning Policy Framework (NPPF) December 2023

1. **Delivering a Sufficient Supply of Homes** (Paragraphs 60-80)
    - Encourages the provision of a range of housing types, including homes in multiple occupancy (HMOs), to meet the diverse needs of the community.
2. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Supports the creation of inclusive and mixed communities, which can include HMOs as part of the housing mix.
3. **Making Effective Use of Land** (Paragraphs 123-130)
    - Promotes the efficient use of land, including the conversion of existing buildings into HMOs to meet housing needs.

Cotswold District Council Local Plan (2018)

1. **Policy H4: Housing Development and Conversion**
    - Encourages the conversion of existing buildings to residential use, including HMOs, particularly where it contributes to meeting local housing needs.
2. **Policy EN2: Design of the Built and Natural Environment**
    - Requires that conversions to HMOs respect the character and appearance of the existing building and its setting.
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for HMOs, ensuring they are integrated into the community and meet local housing needs.

These policies and paragraphs aim to support the provision and integration of homes in multiple occupancy within the community, ensuring they contribute positively to meeting housing needs and maintaining the character of the area.

POLICY QPR1 – ILLUMINATED SIGNAGE

National Planning Policy Framework (NPPF) December 2023

1. **Conserving and Enhancing the Natural Environment** (Paragraphs 180-194)
    - Specifically addresses the need to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes, and nature conservation.

Cotswold District Council Local Plan (2018)

1. **Policy EN8: Biodiversity and Geodiversity**
    - Includes measures to minimise light pollution to protect wildlife and natural habitats.
2. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to consider the impact of light pollution and incorporate design measures to mitigate it.
3. **Policy INF7: Green Infrastructure**
    - Promotes the creation and enhancement of green infrastructure, which includes considerations for reducing light pollution to protect dark skies.

These policies and paragraphs aim to manage and reduce light pollution, ensuring that new developments are designed to protect the natural environment and local amenity.

POLICY QPR2 – QUALITY STREETS & SPACES

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Encourages the creation of safe, accessible, and high-quality public spaces that promote social interaction and community well-being.
2. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of good design in creating attractive, functional, and inclusive streets and civic spaces.
3. **Ensuring the Vitality of Town Centres** (Paragraphs 90-95)
    - Supports the development of vibrant town centres with high-quality public spaces that enhance the user experience.

Cotswold District Council Local Plan (2018)

1. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to include high-quality design principles that enhance the character and appearance of streets and civic spaces.
2. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to ensure that new developments contribute to the creation of high-quality public spaces.
3. **Policy INF2: Social and Community Infrastructure**
    - Supports the provision of social and community infrastructure, including high-quality public spaces, to enhance community well-being.

These policies and paragraphs aim to ensure that streets and civic spaces are designed to be attractive, functional, and inclusive, enhancing the quality of life for residents and visitors.

POLICY QPR3 – SOCIAL & CIVIC SPACES

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Encourages the creation of safe, accessible, and high-quality public spaces that promote social interaction and community well-being.
2. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of good design in creating attractive, functional, and inclusive streets and civic spaces.
3. **Ensuring the Vitality of Town Centres** (Paragraphs 90-95)
    - Supports the development of vibrant town centres with high-quality public spaces that enhance the user experience.

Cotswold District Council Local Plan (2018)

1. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to include high-quality design principles that enhance the character and appearance of streets and civic spaces.
2. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to ensure that new developments contribute to the creation of high-quality public spaces.
3. **Policy INF2: Social and Community Infrastructure**
    - Supports the provision of social and community infrastructure, including high-quality public spaces, to enhance community well-being.

These policies and paragraphs aim to ensure that streets and civic spaces are designed to be attractive, functional, and inclusive, enhancing the quality of life for residents and visitors.

POLICY QPR4 – HERITAGE TRAILS & WAYFINDING SYSTEMS

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Sustainable Transport** (Paragraphs 108-117)
    - Prioritises pedestrian movements within new developments and connections to neighbouring areas.
    - Encourages the provision of high-quality walking infrastructure to promote sustainable transport choices.
2. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Supports the creation of safe and accessible routes for walking to enhance community health and well-being.
3. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of integrating walking routes into the design of new developments to create attractive and functional spaces.

Cotswold District Council Local Plan

1. **Policy INF3: Sustainable Transport**
    - Promotes the development of walking networks to reduce reliance on car travel and support sustainable transport.
2. **Policy INF7: Green Infrastructure**
    - Encourages the integration of walking routes within green infrastructure networks to enhance accessibility and recreational opportunities**.**
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for walking infrastructure, ensuring they are integrated into new developments and accessible to residents.
4. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to consider the needs of pedestrians in their design, promoting safe and convenient access.

These policies and paragraphs aim to promote wayfinding systems, ensuring that new developments are designed to support pedestrian movement.

POLICY TMN1 – 20 MINUTE NEIGHBOURHOODS

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Sustainable Transport** (Paragraphs 108-117)
    - Prioritises pedestrian and cycle movements within new developments and connections to neighbouring areas.
    - Encourages the provision of high-quality walking and cycling infrastructure to promote sustainable transport choices.
2. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Supports the creation of safe and accessible routes for walking and cycling to enhance community health and well-being.
3. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of integrating walking and cycling routes into the design of new developments to create attractive and functional spaces.

Cotswold District Council Local Plan (2018)

1. **Policy INF3: Sustainable Transport**
    - Promotes the development of walking and cycling networks to reduce reliance on car travel and support sustainable transport.
2. **Policy INF7: Green Infrastructure**
    - Encourages the integration of walking and cycling routes within green infrastructure networks to enhance accessibility and recreational opportunities.
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for walking and cycling infrastructure, ensuring they are integrated into new developments and accessible to residents.
4. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to consider the needs of pedestrians and cyclists in their design, promoting safe and convenient access.

These policies and paragraphs aim to promote walkable neighbourhoods and ensure that new developments support walking and cycling as sustainable and healthy modes of transport.

POLICY NE1 – NATURAL AND SEMI-NATURAL HABITAT SCHEMES

National Planning Policy Framework (NPPF) December 2023

1. **Conserving and Enhancing the Natural Environment** (Paragraphs 180-194)
    - Emphasises the importance of protecting and enhancing biodiversity, including the creation and maintenance of wildlife corridors and rewilding initiatives.
    - Paragraph 182 specifically supports the establishment of coherent ecological networks that are more resilient to current and future pressures.
2. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Encourages the provision of green infrastructure, which can include wildlife corridors and rewilding projects to support community health and well-being.
3. **Meeting the Challenge of Climate Change, Flooding, and Coastal Change** (Paragraphs 157-179)
    - Supports the use of natural solutions, such as rewilding and the creation of wildlife corridors, to mitigate climate change impacts and enhance biodiversity.

Cotswold District Council Local Plan (2018)

1. **Policy EN8 & EN9: Biodiversity and Geodiversity**
    - Promotes the protection and enhancement of biodiversity, including the creation of wildlife corridors and support for rewilding projects.
2. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to incorporate green infrastructure, such as wildlife corridors, to enhance biodiversity and support rewilding efforts.
3. **Policy INF7: Green Infrastructure**
    - Encourages the development and enhancement of green infrastructure networks, which can include wildlife corridors and rewilding areas.

These policies and paragraphs aim to support and enhance biodiversity through the creation of wildlife corridors and rewilding initiatives, contributing to the resilience and sustainability of natural environments.

POLICY NE2 – WILDLIFE CORRIDORS

National Planning Policy Framework (NPPF) December 2023

1. **Conserving and Enhancing the Natural Environment** (Paragraphs 180-194)
    - Emphasises the importance of protecting and enhancing biodiversity, including the creation and maintenance of wildlife corridors and rewilding initiatives.
    - Paragraph 182 specifically supports the establishment of coherent ecological networks that are more resilient to current and future pressures.
2. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Encourages the provision of green infrastructure, which can include wildlife corridors and rewilding projects to support community health and well-being.
3. **Meeting the Challenge of Climate Change, Flooding, and Coastal Change** (Paragraphs 157-179)
    - Supports the use of natural solutions, such as rewilding and the creation of wildlife corridors, to mitigate climate change impacts and enhance biodiversity.

Cotswold District Council Local Plan (2018)

1. **Policy EN8 & EN9: Biodiversity and Geodiversity**
    - Promotes the protection and enhancement of biodiversity, including the creation of wildlife corridors and support for rewilding projects.
2. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to incorporate green infrastructure, such as wildlife corridors, to enhance biodiversity and support rewilding efforts.
3. **Policy INF7: Green Infrastructure**
    - Encourages the development and enhancement of green infrastructure networks, which can include wildlife corridors and rewilding areas.

These policies and paragraphs aim to support and enhance biodiversity through the creation of wildlife corridors and rewilding initiatives, contributing to the resilience and sustainability of natural environments.

POLICY NE3 – GREEN INFRASTRUCTURE PROTECTION & ENHANCEMENT

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Encourages the provision and enhancement of green infrastructure to support community health and well-being.
2. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of integrating green infrastructure into the design of new developments to enhance the quality of life and environmental sustainability.
3. **Conserving and Enhancing the Natural Environment** (Paragraphs 180-194)
    - Focuses on protecting and improving natural environments, including green infrastructure, for recreation and biodiversity.
4. **Meeting the Challenge of Climate Change, Flooding, and Coastal Change** (Paragraphs 157-179)
    - Supports the use of green infrastructure to mitigate climate change impacts and manage flood risks.

Cotswold District Council Local Plan (2018)

1. **Policy INF7: Green Infrastructure**
    - Promotes the creation, protection, and enhancement of green infrastructure networks, ensuring that green spaces are accessible and beneficial to the community.
2. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to include high-quality green infrastructure that contributes to the natural environment and community well-being.
3. **Policy EN3: Local Green Spaces**
    - Designates specific areas as Local Green Spaces, protecting them from development and ensuring they remain accessible for community use.
4. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for green infrastructure, ensuring it is integrated into new developments and accessible to residents.

These policies and paragraphs aim to ensure that green infrastructure is an integral part of new developments, enhancing the quality of life for residents and supporting environmental sustainability.

CIRENCESTER NEIGHBOURHOOD PLAN

POLICY NE4 – LOCAL GREEN SPACE DESIGNATIONS

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Healthy and Safe Communities (Paragraphs 96-107)**
    - Encourages the designation of Local Green Spaces to protect areas of particular importance to local communities.
    - Paragraph 106 specifically states that Local Green Spaces should be consistent with the local planning of sustainable development and complement investment in homes, jobs, and other essential services.
2. **Conserving and Enhancing the Natural Environment (Paragraphs 180-194)**
    - Supports the protection and enhancement of green infrastructure, which includes Local Green Spaces.

Cotswold District Council Local Plan (2018)

1. **Policy EN3: Local Green Spaces**
    - Designates specific areas as Local Green Spaces, protecting them from development and ensuring they remain accessible for community use.
2. **Policy INF7: Green Infrastructure**
    - Promotes the creation, protection, and enhancement of green infrastructure networks, which include Local Green Spaces.
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for Local Green Spaces, ensuring they are integrated into new developments and accessible to residents.

These policies and paragraphs aim to ensure that Local Green Spaces are protected and enhanced, contributing to the well-being of the community and the natural environment.

POLICY NE5 – GREEN GAPS

National Planning Policy Framework (NPPF) December 2023

1. **Protecting Green Belt Land** (Paragraphs 142-156)
    - Emphasises the importance of preventing urban sprawl by keeping land permanently open, which includes maintaining green gaps between settlements.
2. **Conserving and Enhancing the Natural Environment** (Paragraphs 180-194)
    - Supports the protection of valued landscapes and the preservation of green gaps to prevent the coalescence of settlements.
3. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Encourages the design of new developments to respect and enhance the character of the area, including the maintenance of green gaps.

Cotswold District Council Local Plan (2018)

1. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to prevent the coalescence of settlements and maintain green gaps.
2. **Policy EN4: The Wider Natural and Historic Environment**
    - Ensures that new developments do not adversely affect important landscapes and green gaps between settlements.
3. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to respect the character and appearance of the area, including the preservation of green gaps.

These policies and paragraphs aim to prevent the coalescence of settlements and maintain green gaps, ensuring that new developments respect and enhance the character of the area.

POLICY LE1 – PROTECT & ENHANCE ECONOMIC ACTIVITY

National Planning Policy Framework (NPPF) December 2023

1. **Building a Strong, Competitive Economy** (Paragraphs 85-89)
    - Emphasises the importance of supporting economic growth and productivity, including the protection and enhancement of economic activity.
2. **Ensuring the Vitality of Town Centres** (Paragraphs 90-95)
    - Supports the role of town centres in providing employment and business opportunities, enhancing their economic activity.
3. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Encourages the provision of community facilities and services that support economic activity and local businesses.
4. **Making Effective Use of Land** (Paragraphs 123-130)
    - Promotes the efficient use of land for economic purposes, including the redevelopment of underutilised sites.

Cotswold District Council Local Plan (2018)

1. **Policy EC1: Employment Development**
    - Supports the provision of new employment sites and the expansion of existing businesses to enhance economic activity.
2. **Policy EC2: Safeguarding Employment Sites**
    - Protects existing employment sites from being lost to other uses, ensuring spaces are available for economic activity.
3. **Policy EC3: Small-Scale Employment Development in Rural Areas**
    - Encourages small-scale employment development in rural areas, supporting local economic activity.

These policies and paragraphs aim to support and enhance economic activity through strategic planning and development.

POLICY LE2 – PROVISION FOR INNOVATIVE WORK SPACES, NEW & SMALL BUSINESSES

National Planning Policy Framework (NPPF) December 2023

1. **Building a Strong, Competitive Economy** (Paragraphs 85-89)
    - Encourages the development of flexible workspaces to support new and growing businesses.
    - Emphasises the importance of supporting economic growth and productivity, especially in areas with high levels of deprivation.
2. **Ensuring the Vitality of Town Centres** (Paragraphs 90-95)
    - Supports the diversification of town centres to include a range of uses, including innovative workspaces and small business hubs.
3. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Highlights the role of planning in creating environments that support social interaction and community facilities, which can include spaces for small businesses and startups.
4. **Making Effective Use of Land** (Paragraphs 123-130)
    - Encourages the use of previously developed land and buildings for new business ventures and innovative workspaces.

Cotswold District Council Local Plan (2018)

1. **Policy EC1: Employment Development**
    - Supports the provision of new employment sites and the expansion of existing businesses, including innovative workspaces.
2. **Policy EC2: Safeguarding Employment Sites**
    - Protects existing employment sites from being lost to other uses, ensuring that there are spaces available for new and small businesses.
3. **Policy EC3: Small-Scale Employment Development in Rural Areas**
    - Encourages small-scale employment development in rural areas, supporting the growth of small businesses and innovative workspaces outside of urban centres.

These policies collectively aim to create a supportive environment for new and small businesses, fostering innovation and economic growth in both urban and rural areas.

POLICY LE3 – SKILLS DEVELOPMENT

National Planning Policy Framework (NPPF) December 2023

1. **Building a Strong, Competitive Economy** (Paragraphs 85-89)
    - Emphasises the importance of supporting skills development to enhance productivity and economic growth.
2. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Encourages the provision of community facilities and services that support skills development and lifelong learning.
3. **Promoting Sustainable Transport** (Paragraphs 108-117)
    - Highlights the role of transport infrastructure in providing access to education and training opportunities.
4. **Supporting High Quality Communications Infrastructure** (Paragraphs 118-122)
    - Supports the development of digital infrastructure to facilitate online learning and skills development.

Cotswold District Council Local Plan (2018)

1. **Policy EC1: Employment Development**
    - Supports the creation of employment opportunities that include training and skills development for local residents.
2. **Policy EC2: Safeguarding Employment Sites**
    - Ensures that employment sites are retained for uses that can provide training and skills development opportunities.
3. **Policy EC3: Small-Scale Employment Development in Rural Areas**
    - Encourages small-scale employment development that includes provisions for skills training and development in rural areas.

These policies aim to create an environment that supports skills development, enhancing the local workforce's capabilities and contributing to economic growth.

POLICY LE4 – NEW EMPLOYMENT PREMISES & DESIGN QUALITY

National Planning Policy Framework (NPPF) December 2023

1. **Building a Strong, Competitive Economy** (Paragraphs 85-89)
    - Supports the development of new employment premises to boost economic growth and productivity.
2. **Ensuring the Vitality of Town Centres** (Paragraphs 90-95)
    - Encourages the creation of diverse and vibrant town centres, including high-quality employment spaces.
3. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of good design in new developments, including employment premises, to create attractive and sustainable environments.
4. **Making Effective Use of Land** (Paragraphs 123-130)
    - Promotes the efficient use of land for new employment premises, ensuring that developments are sustainable and well-integrated into the existing urban fabric.

Cotswold District Council Local Plan (2018)

1. **Policy EC1: Employment Development**
    - Supports the provision of new employment sites and the expansion of existing businesses, with a focus on high-quality design.
2. **Policy EC2: Safeguarding Employment Sites**
    - Ensures that existing employment sites are protected and enhanced, maintaining their quality and suitability for business use.
3. **Policy EN2: Design of the Built and Natural Environment**
    - Sets out design principles to ensure that new developments, including employment premises, are of high quality and contribute positively to the character of the area.
4. **Policy DS1: Development Strategy**
    - Guides the overall development strategy, including the location and design of new employment premises, to ensure they meet the needs of the community and economy.

These policies aim to create high-quality, well-designed employment spaces that support economic growth and enhance the local environment.

POLICY WBC1 – AIR QUALITY

National Planning Policy Framework (NPPF) December 2023

1. **Conserving and Enhancing the Natural Environment** (Paragraphs 180-194)
    - Specifically addresses the need to sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones.
    - Encourages planning policies and decisions to ensure that new development is appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions, and the natural environment.
2. **Meeting the Challenge of Climate Change, Flooding, and Coastal Change** (Paragraphs 157-179)
    - Supports the development of green infrastructure to improve air quality and mitigate climate change impacts.

Cotswold District Council Local Plan (2018)

1. **Policy EN15: Pollution and Contaminated Land**
    - Requires new developments to minimise and mitigate air pollution to protect human health and the environment.
2. **Policy INF3: Sustainable Transport**
    - Promotes the development of sustainable transport options to reduce air pollution from vehicle emissions.
3. **Policy EN2: Design of the Built and Natural Environment**
    - Ensures that new developments consider the impact of air pollution and incorporate design measures to mitigate it.

These policies and paragraphs aim to manage and reduce air pollution, ensuring that new developments are designed to protect the natural environment and local amenity.

POLICY WBC 2 – EQUAL ACCESS TO PUBLIC OPEN SPACES FOR ALL

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Encourages the provision and enhancement of green spaces to support community health and well-being.
2. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of integrating green spaces into new developments to enhance the quality of life and environmental sustainability.
3. **Conserving and Enhancing the Natural Environment** (Paragraphs 180-202)
    - Focuses on protecting and improving natural environments, including the provision of accessible green spaces for recreation and biodiversity.
4. **Meeting the Challenge of Climate Change, Flooding, and Coastal Change** (Paragraphs 157-179)
    - Supports the use of green infrastructure to mitigate climate change impacts and manage flood risks, enhancing access to green spaces.

Cotswold District Council Local Plan (2018)

1. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to include high-quality green spaces that are accessible to the community and contribute to the natural environment.
2. **Policy INF7: Green Infrastructure**
    - Promotes the creation, protection, and enhancement of green infrastructure networks, ensuring that green spaces are accessible and beneficial to the community.
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for green spaces, ensuring they are integrated into new developments and accessible to residents.
4. **Policy EN3: Local Green Spaces**
    - Designates specific areas as Local Green Spaces, protecting them from development and ensuring they remain accessible for community use.

These policies and paragraphs aim to ensure that green spaces are an integral part of new developments, enhancing the quality of life for residents and supporting environmental sustainability.

POLICY WBC 3 – ACCESS TO PLAY SPACES

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Encourages the provision of safe and accessible play spaces as part of creating healthy communities.
2. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of integrating play spaces into the design of new developments to enhance the quality of life.
3. **Conserving and Enhancing the Natural Environment** (Paragraphs 180-202)
    - Supports the protection and enhancement of natural environments, including the provision of accessible play spaces for recreation and well-being.

Cotswold District Council Local Plan (2018)

1. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to include high-quality, accessible play spaces that contribute to the well-being of the community.
2. **Policy INF7: Green Infrastructure**
    - Promotes the creation and enhancement of green infrastructure networks, ensuring that play spaces are accessible and beneficial to the community.
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for play spaces, ensuring they are integrated into new developments and accessible to residents.
4. **Policy EN3: Local Green Spaces**
    - Designates specific areas as Local Green Spaces, protecting them from development and ensuring they remain accessible for community use.

These policies and paragraphs aim to ensure that play spaces are an integral part of new developments, enhancing the quality of life for residents and supporting community well-being.

POLICY WBC 4 – COMMUNITY FACILITIES

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Encourages the provision and enhancement of community facilities to support social interaction and community well-being.
2. **Ensuring the Vitality of Town Centres** (Paragraphs 90-95)
    - Supports the inclusion of community facilities in town centres to enhance their vitality and viability.
3. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of integrating community facilities into the design of new developments to create attractive and functional spaces.
4. **Supporting High Quality Communications Infrastructure** (Paragraphs 118-122)
    - Highlights the role of digital infrastructure in supporting community facilities and services.

Cotswold District Council Local Plan (2018)

1. **Policy INF2: Social and Community Infrastructure**
    - Supports the provision and enhancement of social and community infrastructure, ensuring that facilities are accessible and meet the needs of the community.
2. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include provisions for community facilities, ensuring they are integrated into new developments and accessible to residents.
3. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to include high-quality community facilities that contribute to the well-being of the community.
4. **Policy INF7: Green Infrastructure**
    - Promotes the creation and enhancement of green infrastructure networks, which can include community facilities such as parks and recreational areas.

These policies and paragraphs aim to ensure that community facilities are an integral part of new developments, enhancing the quality of life for residents and supporting community well-being.

POLICY WBC 5 – DESIGNING OUT CRIME

National Planning Policy Framework (NPPF) December 2023

1. **Promoting Healthy and Safe Communities** (Paragraphs 96-107)
    - Encourages planning policies and decisions to aim for places that are safe, inclusive, and accessible, where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.
2. **Achieving Well-Designed and Beautiful Places** (Paragraphs 131-141)
    - Emphasises the importance of good design in new developments to create safe environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

Cotswold District Council Local Plan (2018)

1. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to incorporate design principles that reduce opportunities for crime and fear of crime, ensuring that places are safe and secure.
2. **Policy INF2: Social and Community Infrastructure**
    - Supports the provision of community infrastructure that includes measures to design out crime, enhancing the safety and security of public spaces.
3. **Policy DS1: Development Strategy**
    - Guides the overall development strategy to include considerations for designing out crime, ensuring that new developments contribute to safe and secure environments.

These policies and paragraphs aim to integrate crime prevention measures into the planning and design process, creating safer and more secure communities.

POLICY WBC 6 – LIGHT POLLUTION

National Planning Policy Framework (NPPF) December 2023

1. **Conserving and Enhancing the Natural Environment** (Paragraphs 180-194)
    - Specifically addresses the need to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes, and nature conservation.

Cotswold District Council Local Plan (2018)

1. **Policy EN15: Pollution and Contaminated Land**
    - Requires new developments to minimise and mitigate noise pollution to protect human health and the environment.
2. **Policy EN8: Biodiversity and Geodiversity**
    - Includes measures to minimise light pollution to protect wildlife and natural habitats.
3. **Policy EN2: Design of the Built and Natural Environment**
    - Requires new developments to consider the impact of light pollution and incorporate design measures to mitigate it.
4. **Policy INF7: Green Infrastructure**
    - Promotes the creation and enhancement of green infrastructure, which includes considerations for reducing light pollution to protect dark skies.

These policies and paragraphs aim to manage and reduce light pollution, ensuring that new developments are designed to protect the natural environment and local amenity.

POLICY WBC 7 – NOISE POLLUTION

National Planning Policy Framework (NPPF) December 2023

1. **Conserving and Enhancing the Natural Environment** (Paragraphs 180-194)
    - Specifically addresses the need to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution.

Cotswold District Council Local Plan (2018)

1. **Policy EN15: Pollution and Contaminated Land**
    - Requires new developments to minimise and mitigate noise pollution to protect human health and the environment.
2. **Policy EN2: Design of the Built and Natural Environment**
    - Ensures that new developments consider the impact of noise pollution and incorporate design measures to mitigate it.
3. **Policy INF7: Green Infrastructure**
    - Promotes the creation and enhancement of green infrastructure, which can help mitigate noise pollution and improve the quality of life.

These policies and paragraphs aim to manage and reduce noise pollution, ensuring that new developments are designed to protect the natural environment and local amenity.

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Cirencester Neighbourhood Plan

Consultation Statement













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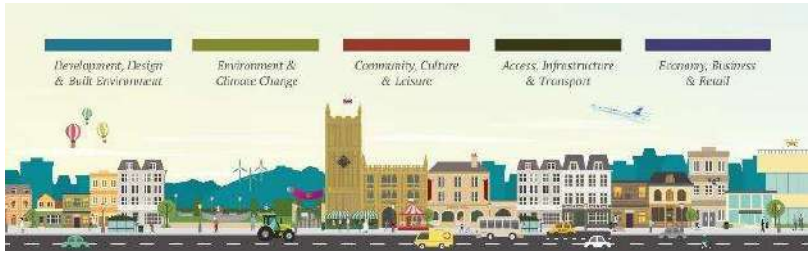


Introduction

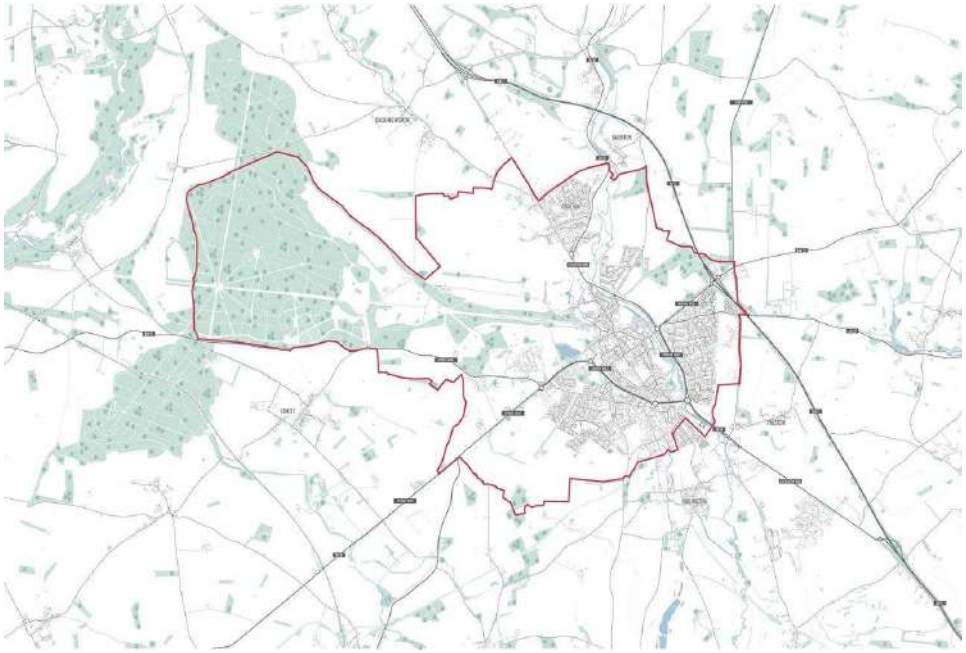
Cirencester Town Council has prepared a neighbourhood plan on behalf of those who live and work within the town of Cirencester, to build on previous place shaping work, such as the Community Plan 'Our Future Cirencester', the Public Realm Design Code and planning Concept Statement. The plan sets out a vision for the town through to 2041 and is supported by a set of planning polices and a series of specific projects. In accordance with the neighbourhood planning regulations, the plan has been prepared through extensive community consultation. This report records that consultation process and shows how the plan was revised as a result of the responses received.

About This Document

This consultation statement provides a summary of the engagement with the public, which generated the ideas and suggestions that led to the plan that has now been published for consultation. It also contains a detailed record of pre-consultation comments received.

Background to the Cirencester Neighbourhood Plan

On Tuesday 11th September 2018, Cirencester Town Council agreed arrangements for proceeding with the preparation of a Neighbourhood Plan, including an application to Cotswold District Council (CDC) to designate the whole of the Cirencester parish as a neighbourhood area. The preparation of a Neighbourhood Plan for Cirencester was subsequently commissioned by the Town Council, as the qualifying body, under provisions in the Localism Act 2011.



This Neighbourhood Plan represents the voice or our community, through its future vision for Cirencester and through planned sustainable growth, which meets community need and protects Cirencester's unique qualities. A Steering Group, including community representatives, was appointed to lead on the preparation of the Plan with Richard Eastham at Feria Urbanism being appointed by Council as the lead planning consultant.

The original purpose of preparing the Neighbourhood Plan was to add detail relevant to Cirencester, to Local Plan policies and propose new planning policy on issues that the Local Plan was silent on. A further requirement was the necessity to maintain the unique quality of the town's heritage and architecture while developing a plan that sought to mitigate the impact of climate change and improve health and wellbeing.

Cirencester is a relatively large settlement to be a designated neighbourhood area, and with a population of circa 20,000 people, undertaking full engagement with all demographics and organisations presented a significant challenge.

In the autumn of 2018, the Town Council established a Steering Group consisting of community volunteers, Town Councillors and ex-officio appointments including the Lead Member for Climate and Environment, officers and an elected representative from Cotswold District Council.

In March 2020, after time researching how to develop a Neighbourhood Plan and preparing an outline of its necessary contents, the Steering Group engaged widely within

the community, including local groups and businesses, through its 'Have Your Say' consultation. This identified various issues which needed to be addressed.

Five thematic groups were established to research the issues facing Cirencester, these were:

- Access, Infrastructure and Transport
- Community, Culture and Leisure
- Development, Design and Built Environment
- Economy, Business, and Retail
- Environment and Climate Change

This research, carried out via Zoom during the first lockdown, created an excellent platform for subsequent phases of the project. It also highlighted the need for the appointment of a specialist Planning Consultant to lead and direct the work. In the Spring of 2021, the Steering Group through the Town Council engaged Feria Urbanism, an urban design and urban planning consultancy.

The Steering Group consulted the public again via a series of themed digital workshops run by Feria Urbanism, who also sought contributions from primary school pupils and held face-to-face workshops with Cirencester College students.

The results of the thematic work, digital workshops and student input were then pulled together in a Progress Report and published. Community feedback and comments were then collected during August and September 2021 via a series of pop-up stalls in the town centre and an on-line questionnaire.

In early December 2021, the Steering Group organised a three-day exhibition. This comprised display boards, interactive tasks, and a slideshow presentation, available online should any member of the public not be able to attend in person.

The next stage of the process was to prepare the Regulation 14 draft Neighbourhood Plan. With extensive research and public engagement, this was a complex process. To assist with reviewing the granular detail and start drafting policy, various sub-groups were established, including town centre connections and non-designated heritage assets. At the initial stage, the Town Centre Connection Sub-Group worked closely with officers at Cotswold District Council and their consultants on the development of the Town Centre Master Plan. The final iteration of the masterplan, both in concept and detail and which is referenced in Chapter 5 of the Plan, falls within the remit and responsibility of Cotswold District Council.

In 2023, the Regulation 14 draft Neighbourhood Plan document was published for formal consideration and statutory consultation. The Steering Group signed-off the draft document with minor updates on 10th October, the document was then approved in principle on 17th October by the Town Council's Planning Committee, subject to various revisions being made.

On 14th November 2023, Cirencester Town Council formally approved the Vision, Aims and Objectives, and Planning Policies for statutory consultation.

The Reg 14 statutory consultation took place between the 1st February 2024 and 17th March 2024. In addition to using the online Commonplace citizen engagement platform, a three-day drop-in event was held at the Corinium Museum in Cirencester; this included illustrative display boards, paper copies of the Reg 14 document and

questionnaire, and a presentation from Feria Urbanism, which was recorded and made available online.

The feedback and comments from the public and statutory consultees were collated and presented to the Steering Group in May 2024 and further analysis undertaken.

In consultation with Feria Urbanism and the Steering Group the Reg 14 document was revised between August and October 2024 and the Reg 16 Neighbourhood Plan was drafted.

The Town Council's Planning Committee reviewed the policies and basic conditions statement on the 27th August 2024 and 22nd October 2024 respectively, with the Steering Group endorsing the final draft on the 7th of November 2024 for recommendation to Council.

The Town Council considered approval of the Reg 16 Neighbourhood Plan for formal submission to Cotswold District Council on the 12th November 2024.

A detailed evidence base of consultation and engagement throughout the process of preparing the Neighbourhood Plan, including the response to the statutory consultation is included within the Consultation Statement.

Acknowledgments

Preparing the Neighbourhood Plan has been a community participative process with residents being appointed to the Steering Group and directly involved with shaping the Reg14 document.

Cirencester Town Council wishes to thank the people of Cirencester whose responses and comments contributed to the Neighbourhood Development Plan policies and the dedicated group of community volunteers on the Neighbourhood Plan Steering Group, past and present, who went above and beyond to ensure the needs of the community are reflected in the Plan.

- Current members: Nicholas Arbuthnott, Tony Buxton and Martin Portus.
- Previous members: Christina Ibbotson, the late Jim Grant, Brian Hudson, the late Patrick Moylan, Marco Taylor, Jon Athawes, Meg Blumsom, Tristan Wilkinson, Carole Boydell, Anne Simpson and James Haestier.

The Town Council would also like to acknowledge the input of Richard Eastham at Feria Urbanism and Forward Planning and Community Partnerships Teams at Cotswold District Council, with particular thanks to James Brain and Joseph Walker, respectively, who have provided invaluable advice and support throughout the process.

In addition to the community representatives, various elected representatives serve on the Steering Group, currently they are: Councillor Nigel Robbins, Councillor Andy Jopp and Councillor Patrick Coleman. Councillor Sabrina Dixon, Chair of the Town Council's Climate and Environment Committee and Andrew Tubb, Chief Executive Officer of the Town Council are also members of the Steering Group in a non-voting advisory capacity.

Cirencester Neighbourhood Planning Timeline

Cirencester Neighbourhood Plan

Jun 2019

Neighbourhood Plan Steering Group convened with community representatives, local Councillors

Feb 2020

Website & Communications Launched

Mar 2020

Early Community Engagement via a questionnaire survey



Apr 2020

Thematic Groups formed & begin work to develop specific policy & project ideas

Apr/Jun 2021



Youth Engagement with college and engagement with children through local schools

Summer 2021



Consultation on Progress Report

Spring 2021

Digital Focus Groups held on Zoom to test ideas further

Cirencester Neighbourhood Planning Timeline

Cirencester Neighbourhood Plan

Winter 2021

Ideas, Issues and Options Engagement



Autumn 2021

Refine policy and project ideas based on feedback received

Feb 2024

Formal Reg14 Consultation Launched



Three-day drop-in exhibition event with presentations

Feb 2024

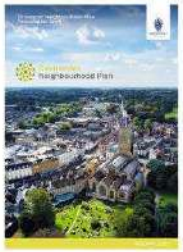
Spring 2024

Reg14 Consultation Analysis



Autumn 2024

Reg16 Preparation



Winter 2024 Reg16 Published

Feb 2025

Social Media and Communications

The Steering Group recognised the importance of communication and providing local people the opportunity to engage and get directly involved in the decision-making processes which, through the Neighbourhood Plan, would make a difference in meeting the social, economic and environmental needs of the community. All members of the Steering Group were encouraged to play their part in engaging with the public; this was through providing updates to organisations they were members of, or in general discussions with family, friends and neighbours, which reinforced the importance of the more formal contact with public and stakeholders.

It was vital that we encouraged healthy debate and discussion, recognising that not everyone has the same point of you; if, for whatever reason, an individual member of the Steering Group had a different view to that of the Council or the Steering Group, they had the right to express that view.

In 2019, at a very early stage in the process a communication strategy was prepared for community engagement and involvement. Getting the social media and communications right was a key part in ensuring that the community had the opportunity to contribute to the preparation of the Plan.

The Cirencester Neighbourhood Plan Steering Group is conscious of the difference between community engagement and participation, and simple consultation. The intention was therefore to encourage an active dialogue with the community during the engagement stages, using a mix of approaches that would ensure the community had a clear understanding of the issues, opinions and ideas being discussed.

Community interest and engagement was also promoted through the encouragement of active participation in the work of producing the Neighbourhood Plan, through various workshops and events. The engagement and participation process also included measures to ensure that local commercial businesses, social enterprises, voluntary and community organisations and groups, schools, faith groups, official bodies and special interest groups had the opportunity to be involved. Social media and communication channels included:

- Cirencester Town Council Facebook
- Cirencester Town Council Instagram
- Cirencester Town Council Twitter
- Cirencester Town Council LinkedIn
- Cirencester Town Council YouTube
- Cirencester Town Council Website
- Cirencester Town Council Commonplace Citizen Engagement Platform
- Cirencester Neighbourhood Plan Website
- Cirencester Town Council Newsletter Contact List
- Cirencester Neighbourhood Plan Contact and Stakeholder List
- Community Noticeboards
- Community and Friends of Groups
- Cirencester Chamber of Commerce
- Cirencester College
- Cirencester Scene Magazine

Initial Questionnaire Engagement March 2020



Through early engagement we found out that of particular valued to residents was: open and green spaces, history and heritage of the town, an accessible town centre with good links to road networks and other towns/cities, rich array of architecture, beautiful town centre, range of individual and independent shops, the community spirit within the town, the Hospital and the range of cultural and educational institutions within the town.

The predominant concerns were: building on green land, pollution, inadequate infrastructure and parking, overdevelopment of housing leading to overcrowding and additional pressure on already pressurised key services, facilities and amenities, the abundance of shops closing and the amounts of empty retail space, the reduction in health and youth services and provision.

The changes most desired for Cirencester were: to tackle climate change and reduce pollution, further enhancement of the town's green spaces, resolve the parking issues and explore alternative transport links and services, control and manage future developments and undertake maintenance of town centre 'eye sores' for, support local businesses more and promote tourism to attract more visitors, provide a cinema and initiate further social events and activities, improve youth services and provision.

Opinions were encouraged and sought from a range of people with differing needs and usage including those who live, shop, work, or study in Cirencester and those who visit the town. Opinions were invited via an on-line survey which was completed between January and May 2020 (pre and during covid-19) which may have had some bearing on individual responses. Headline data on the quantitative responses was collated and shared with the Steering Group via a ppt file.

Respondents were also asked for 'write in' or open opinions on what they most valued about Cirencester, what their main concerns for the town were, and what changes they would like to see being made within the town, in and for the future. This data has been analysed as a whole and then drilled down further by age group and residency in order to understand what is important to the respondents and to assist in the development of the neighbourhood plan going forward.

All open responses were collated under the following themes – Please see Appendix A:

- Environment and Climate Change
- Access, Infrastructure and Transport
- Development, Design and Built Environment
- Economy, Business and Retail
- Community, Culture and Leisure

There were many and varied responses that were grouped by age as follows: 16-29; 30 – 64 and 65+, with some more pressing and prevalent than others, therefore there is a list for each of the write-in columns as above together with either major or minor alongside each issue to indicate the salience of that particular issue. Where there are discernible differences of opinions e.g. by age group, these are also included together with supporting quotes or other suggestions. Open responses on why people think the various issues are very important in the survey will be provided in a separate document in order to keep this report terse and concise. It is worth noting there were no discernible differences by residency nor were there significant deviations from the general view by sub group(s) although reasons why the various issues are very important to individuals were extremely varied.

Children and Young People Engagement Spring 2021

As part of the preparation of the Progress Report, the Neighbourhood Plan Team undertook engagement with local primary schools and Cirencester College:



Youth Engagement with Cirencester College

Earlier this year, the neighbourhood plan team worked with young adults from Cirencester College, who shared their experiences of life in the town and the things they would like to improve in the future.

With the support of the geography staff, the college students participated in a design workshop in Cricklade Street, using foam blocks light enough to move but strong enough to sit on. These blocks sparked illuminating conversations with the public about how the town can be better designed as a place to stay rather than a place to shop and how it can be more welcoming to young people.

What the college students said ...

"We come to town to meet up, to go to a café"

"We often meet in Abbey Grounds as it is a more open space"

"It would be good if there were fewer cars in town"

"We like Black Jack Street because there are lots of independent shops, there is lots to look at and it feels like you are in another country"

"Black Jack Street is nice because there are plants outside the shops, it looks more welcoming than Cricklade Street"

"Abbey Gardens could have more events, such as five-a-side football"

"There needs to be more public space – the area behind Cricklade Street – there is loads of space here but it is badly designed, this could be a great social space with a market"

"There are no public toilets in the park or town centre and there really needs to be otherwise you have to go into a café"

"We really like the area outside the Abbey with the coffee vans and informal seating"

"The skate park is far away from town. It's like we don't belong in town. If the skate park was closer to town we would use the shops and cafés"

To see more results and to add your own ideas to the mix, please go to www.cirencesternp.org

Meanwhile, the neighbourhood plan team have asked children at several local schools — Chesterton, Watermoor, Stratton, Paternoster and Powell's — for their ideas. These younger children from across Cirencester have been creatively designing playful new spaces. Using a bespoke worksheet distributed through the schools, they were asked a series of questions and invited to draw ideas for the future. Below is a summary of the main messages received.

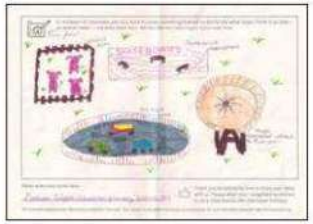
Q. Talk to each other about your journey to school. Please write down three things that would improve your journey.

Number of responses from the total of 97 received that included these types of details...

... and the top three suggestions within that category of response

1	**Modes of Transport**	**65**
	More Cycle Paths or Routes	16
	Less Traffic & Fewer Cars	14
	More Cycling	8
2	**Maintenance**	**52**
	Less Dog Mess	16
	Cleaner, Less Litter	13
	Fewer Potholes	10
3	**Improving Streets & Paths**	**42**
	Lower Speed Limits, Less Speeding	7
	Wider Walking Paths	7
	More or Different Routes	6







Here are just a few examples of the 97 schools worksheets returned to the project team. Careful analysis of all the drawings provided an insight to the types of changes this age group would like to see.

To see more results and to add your own ideas to the mix, please go to www.circencesternp.org

Q: Imagine you have a friend from far away coming to visit. They want to see Cirencester. Where would you take them and why?

1	**Pretty Outdoor Places**	**69**
	Abbey Grounds	18
	Parks	17
	Cirencester Park	15
2	**Urban & Civic Places**	**48**
	Museum	8
	Shops	6
	Town Centre	5
3	**Adventure Activities & Sports**	**29**
	The Outdoor Pool	9
	Other Swimming Pools	5
	Leisure Centres	3

Q. You are Mayor of Cirencester! Please create something that will be fun for the whole town. Think of an idea — or several ideas!

1	**Sports & Adventure Activities**	**52**
	Trampoline Park	10
	Water Park	10
	Skate Park	8
2	**Entertainment & Things To Do**	**52**
	Cinema	11
	Fun Fair	7
	Theme Park	5
3	**Playground Equipment**	**50**
	Slides	10
	Swings	10
	More Playgrounds	6

Themed Digital Workshops Spring 2021

In early 2021 the NPSG ran a series of Zoom events designed to raise awareness of the different topics. The issues and places mentioned in the Zoom conversations were plotted on a Google map file. These were subsequently used to inform a Progress Report.



1. THE CIRENCESTER TOWN CENTRE OF THE FUTURE

Monday 19th April 7.30pm – 9.00pm via Zoom

- **https://us02web.zoom.us/j/86443551770?pwd=Ump6QTUyMTVDRy83VEc1WER4aVZMUT09**
- **Meeting ID: 864 4355 1770**
- **Passcode: 841567**

What will Cirencester Town Centre look and feel like ten years from now? What will be the attractions, destinations, jobs, and employment of the future? While nobody can accurately predict the future, through the Neighbourhood Plan, we can shape the future of the Town Centre as best we can. Even before the Covid-19 lockdowns, town centres were changing with a rapid decline in retailing. As we emerge into a new world, what will make the Town Centre an appealing place to spend time?

This session is a working focus group, using digital maps. It will last 90 minutes and is limited to 15 participants. This is an early session to begin to develop themes and ideas for the Cirencester Neighbourhood Plan. If you cannot take part on this date, or there are



2. DESIGN & THE BUILT ENVIRONMENT

Tuesday 20th April 7.30pm – 9.00pm via Zoom

- **https://us02web.zoom.us/j/86477877117?pwd=M1Q4R2s1S2MrVTd3UGtuMUYwajNEdz09**
- **Meeting ID: 864 7787 7117**
- **Passcode: 030997**

Cirencester has a long and rich history, and this leaves a legacy of many fabulous heritage buildings. The town contains 379 Listed Buildings, seven Scheduled Ancient Monuments and four Conservation Areas, all testament to this richness of the town's built environment. While these assets all benefit from national level protection, what more can the Neighbourhood Plan do? What policies or proposals should the plan contain to ensure that future building meets the needs of the town?

This session is a working focus group, using digital maps. It will last 90 minutes and is limited to 15 participants. This is an early session to begin to develop themes and ideas for the Cirencester Neighbourhood Plan. If you cannot take part on this date, or there are no places remaining, do not worry. There will be further opportunities to contribute as the Neighbourhood Plan project develops.



3. ACCESS & MOVEMENT

Wednesday 21st April 1.00pm – 2.30pm via Zoom

- **https://us02web.zoom.us/j/83375602789?pwd=Z0xjRnJobnVUSjJQUlNzZSsxZ0dJZz09**
- **Meeting ID: 833 7560 2789**
- **Passcode: 978173**

How do you get around Cirencester? Can you access the places you need to get to easily and without too much hassle? Or do you find it difficult and frustrating? Are the streets and spaces easy to navigate? What can make life easier for you as a pedestrian or somebody that needs to go into town often? We know that Covid-19 restrictions have limited our ability to move around but as the town comes out of lockdown, what changes would you want to see? How can we build a town where everybody has equal opportunity, no matter how the choose to travel?

This session is a working focus group, using digital maps. It will last 90 minutes and is limited to 15 participants. This is an early session to begin to develop themes and ideas for the Cirencester Neighbourhood Plan. If you cannot take part on this date, or there



4. CULTURE, LEISURE & SPORTS

Thursday 22nd April 1.00pm – 2.30pm via Zoom

- **https://us02web.zoom.us/j/85007450957?pwd=NUFzUHV6em9hSWtBUkpGKzRpcjhLUT09**
- **Meeting ID: 850 0745 0957**
- **Passcode: 431747**

Are you a member of a sports club in Cirencester? This could be traditional team sports like football, cricket, or rugby. Or more individual sports, like running, cycling or tennis. Does your chosen sport need facilities, like a club house, changing rooms or pitches? What investment do you need to keep your sport popular and allow participation to flourish? The Neighbourhood Plan can include planning policies to help support sports and leisure activities across the town and we want to hear from you.

What is the culture of Cirencester? Where and what are the cultural hotspots? The theatres, pubs, cinemas, museums, nightclubs – we want to explore the culture of the town, both the visible and the less obvious. What traditions do you want to keep alive? And what are the alternative cultural trends? Music, art, and design? What cultural attractions will keep Cirencester alive and dynamic in future. We know that Covid-19 lockdowns have seriously affected cultural life around the world. Now is the time to review what culture means to us all and to look ahead to a brighter cultural future.

This session is a working focus group, using digital maps. It will last 90 minutes and is limited to 15 participants. This is an early session to begin to develop themes and ideas for the Cirencester Neighbourhood Plan. If you cannot take part on this date, or there are no places remaining, do not worry. There will be further opportunities to contribute as the Neighbourhood Plan project develops.

Summer 2021 Engagement – Progress Report

The purpose of the summer consultation was to raise awareness of the Neighbourhood Plan, encourage people to participate by joining our electronic mailing list and to review the Progress Report, and complete a survey.

This was achieved through emailing a covering letter and a copy of the Progress Report to the NP mailing list, running four pop-up stalls in the town centre, an advert in the Cirencester Scene, social media posts and further contact with primary schools and Cirencester College.



Summer Consultation in Figures

466 Progress Reports sent to mailing list

143 comments noted at our pop-up stalls

65 names added to mailing list

200 Progress Reports handed to residents

interested in completing survey

40 hours of face to face consultation

The summer communications exercise had three main purposes, all of which were considered important precursors to the formal consultation exercise later in the year.

1. To raise awareness of the Neighbourhood Plan, its aims and its progress so far
2. To increase the number of people on the mailing list, who will receive updates and invitations to future consultations.
3. Encourage people to complete the online survey, by directing to the website or taking a paper copy

An initial analysis of activities identified four main strands which were achievable within the timescale and resource available. The following were chosen.

1. Four pop-up stalls to allow a face to face discussion with residents and visitors
2. Email contact with the existing mailing list
3. Promotion through social media and through an all page advert in Cirencester Scene
4. Further contact through primary schools and Cirencester college following on from the earlier summer engagement

A possible option of a stall at the Phoenix Festival did not take place because the Festival was cancelled. This was a shame as it would have provided exposure to a younger demographic, who have so far been difficult to engage.

Pop-up Stalls

These took place on Cricklade Street and in the Market Place. The Saturday events were busier than the Tuesday afternoon, although the latter was aimed at perhaps catching a different demographic, specifically younger parents after school. The Saturday sessions lasted three hours, the Tuesday one about two hours. Each stall was staffed by members of the NP Steering Group. Two interns from Cirencester Town Council joined us for the Tuesday pop-up. The stall was identifiable by the promotional banner.

Passers-by were asked to participate by identifying which things in Cirencester they liked or disliked, either verbally or by placing a sticker on one of two maps, or both. The initial questions were designed to help people begin to engage with the ideas and purpose behind the Neighbourhood Plan. They were then invited to participate further by reading the progress report, either in hard copy or online, and then completing the online survey.

Everyone was invited to provide their name and email (or phone) contact with the incentive of being entered into a prize draw to win £50 of vouchers to the local theatre. Everyone was encouraged to complete the questionnaire.

Key Learning Points:

- The limited number of responses (32 questionnaires completed) reflecting the lack of awareness of a Neighbourhood Plan (and Steering Group) suggested that we needed to raise our public profile. A review was carried out by the SG to consolidate how best to achieve this.
- There was no doubt that meaningful consultation is time consuming, and the time Steering Group members were able to give to this was limiting the amount of consultation. There was possibly a role in extending the public interface to include associates. However, we sought to identify other sources of people who would be willing to help as part of a promotional group.
- Future engagement needed to encompass a wide range of styles, from webinars, talks to groups shop front displays, further pop-ups. We considered a range of supporting publicity material, such as power point presentations and a standalone YouTube video.
- We also considered designs for future promotional work, and considered how to explain what could and could not be included in a neighbourhood plan. This was also a way of explaining why certain comments had not been included and that they have not been ignored.

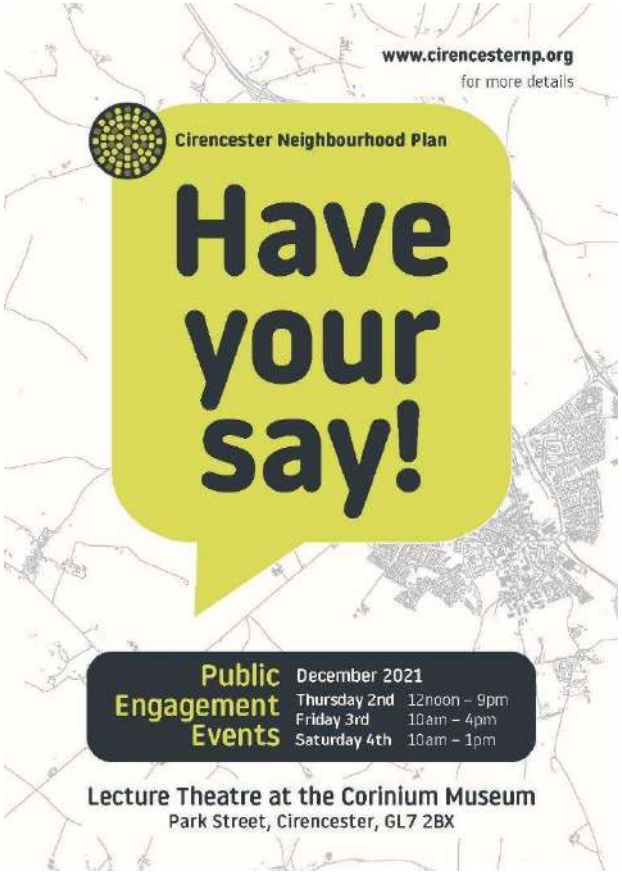
December 2021 Engagement – Ideas, Issues and Options

This engagement provided further opportunity to raise awareness of the Neighbourhood Plan process and to test public responses in an informal way to the emerging ideas. As part of this engagement an exhibition was set up, with a series of posters and interactive tasks, outlining the ideas, issues and options discussed by the public and the Steering Group. A presentation was given by our Planning Consultant, Feria Urbanism, which was also recorded on video and published on our website.



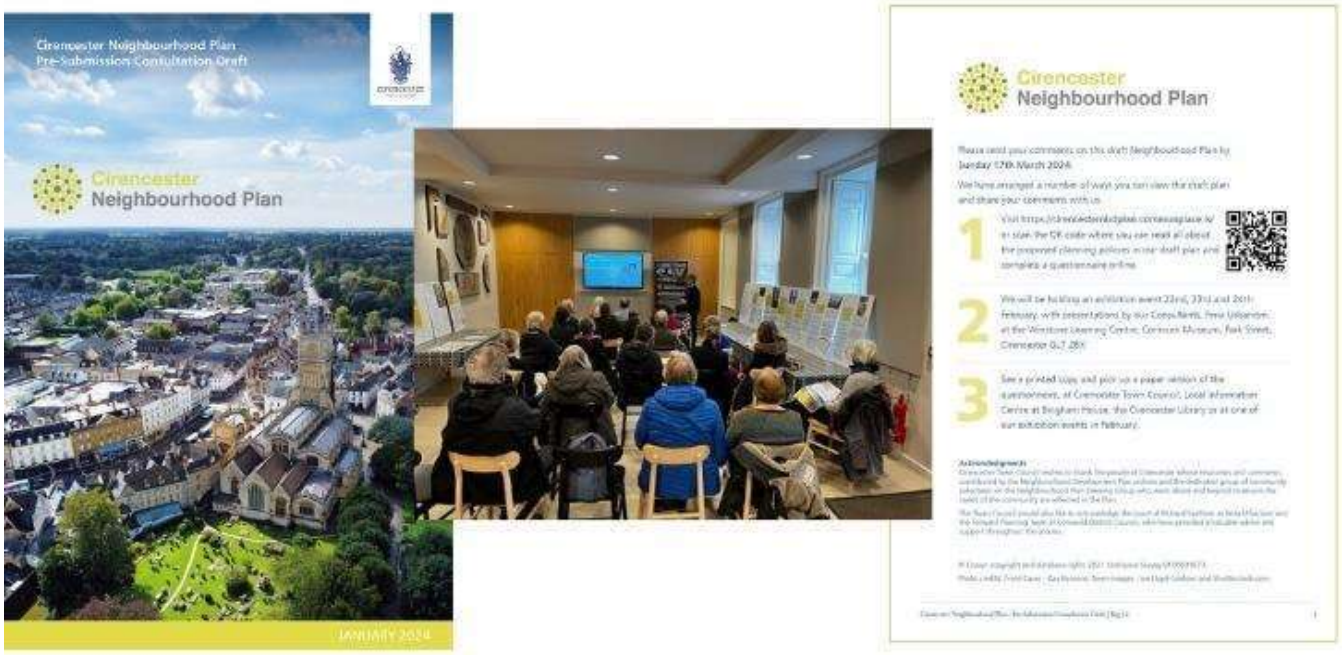






February 2024 Reg14 Consultation

The Cirencester Neighbourhood Plan Regulation 14 Consultation, where we asked for opinion on the draft Plan and 38 proposed policies, ran for over six-weeks between 1st February and 17th March 2024. The proposed policies addressed issues such as environment, heritage, community, access, movement, streets, spaces, town centre and local economy.



The Statutory Consultees were written to by Cirencester Town Council on 1st February and included the following list of organisations: Cotswold District Council, Gloucestershire Police, Gloucestershire County Council, Gloucestershire Highways, GFirst Local Enterprise Partnership (LEP), Local Nature Partnership, Cotswolds AONB, Thames Water, Historic England, Natural England, Environment Agency, Clinical Commissioning Group, National Grid, Chamber of Commerce, Local Parish Councils (Siddington, Baunton, Preston, Sapperton, Duntisbourne, Daglingworth, Coates, Kemble and Ewen).

We arranged a number of ways the public could view the draft Plan and share comments with us:

By visiting https://cirencesternbdplan.commonplace.is/ to read about the proposed vision, aims and objectives, and planning policies and to respond online to quick emoji response questions about each policy and section of the draft Plan as well as providing comments by completing a questionnaire online.

We held a three-day drop-in exhibition event 22nd, 23rd and 24th February, at the Winstone Learning Centre, Corinium Museum, Park Street, Cirencester GL7 2BX where the public were invited to drop-in to see a poster exhibition, meet and ask questions of the Neighbourhood Plan Steering Group and attend presentations by our Consultant, Feria Urbanism. The posters provided a summary of the planning policy content of the Neighbourhood Plan. The presentation made by Feria Urbanism was captured on video and made available in the days afterwards online. Over 150 of people visited our drop-in Exhibition at the Corinium Museum and shared their thoughts with members of the Neighbourhood Plan Steering Group.

The public were also directed to www.cirencesternp.org for more background information and progress to date and were invited to see a printed copy and pick up a paper version of the questionnaire, at Cirencester Town Council Local Information Centre at Bingham House, Cirencester Library or at one of our exhibition events in February.

Table 1 below summarises the 930 contributions received from the Reg14 questionnaire, by Policy and Topic. Overall, 65.3% of responses were positive, 28.1% neutral and 6.6% negative. This was very encouraging and demonstrated clear level of support for all aspects of the draft version of the Neighbourhood Plan.

Reg14 Consultation Responses can be found in **Appendix D** as follows:

- **Table 3** - Responses from Statutory Consultees and other Organisations
- **Table 4** - Responses from Members of the Public and other Organisations
- Sentiment Pie Charts illustrating reactions to each Policy - also summarised in the table below:

Table 1

Policy	Topic	Positive (%)	Neutral %	Negative (%)
	Vision	74.6	18.7	6.7
	Aims & Objectives	75	16.1	8.9
	Process Undertaken in the Preparation of the Plan	71.4	24.5	4.1
AM1	Cirencester Spoke & Wheel Network	78.6	15.7	5.7
AM2	Town & Country Connections	85	11.7	3.3
AM3	Pedestrian Experience	81.2	10.4	8.4
AM4	Integrated Mobility Hub	84.4	12.5	3.2
AM5	Strategic Connections & Transport Links	88.6	11.4	-
TC1	Town Centre (General Development)	67.2	23.6	9.1
TC2	Town Centre (Areas of Change)	61.8	29.1	9.1
DBE1	Design Quality	78.3	15.2	6.5

DBE2	Protection of Landscape & Townscape Views	82.2	11.1	6.6
DBE3	Conversion of Existing Properties	90	6.7	3.3
DBE4	Protection of Non-Designated Heritage Assets	84.1	11.4	4.5
DBE5	Net-Zero & Energy Efficiency Measures in the Design & Construction Process	75	17.9	7.1
DBE6	Energy Use in New Buildings	75.6	15.6	8.9
DBE7	Homes in Multiple Occupation	71	25.8	3.2
QPR1	Illuminated Signage	87.8	9.8	2.4
QPR2	Quality Streets & Spaces	82.8	13.8	3.4
QPR3	Social & Civic Spaces	80.5	17.1	2.4
QPR4	Heritage Trails & Wayfinding Systems	89.7	10.3	-
TMN1	20 Minute Neighbourhoods	71.8	8.7	19.6
LE1	Protect & Enhance Economic Activity	74.3	12.8	12.9
LE2	Provision for Innovative Work Spaces, New & Small Businesses	92.3	7.7	-
LE3	Skills Development	81.5	18.4	-
LE4	New Employment Premises & Design Quality	85.1	11.1	3.7
NE1	Biodiversity Net Gain	83.7	8.2	8.1
NE2	Rewilding Schemes	81	10.8	8.1
NE3	Wildlife Corridors	91.7	8.3	-
NE4	Green & Blue Infrastructure Protection & Enhancement	89.5	5.3	5.2
NE5	Flood Mitigation	77.1	14.6	8.4
NE6	Local Green Space Designations	90.2	4.9	4.9
NE7	Green Gaps	72.5	12.5	15
WBC1	Air Quality	68.9	20	11.1
WBC2	Health Impact Assessment	67.3	20.4	12.3
WBC3	Equal Access to Green Spaces for All	82.4	14.7	2.9
WBC4	Access to Play Spaces	87.1	6.5	6.4
WBC5	Community Facilities	76.7	23.3	-
WBC6	Designing Out Crime	87.5	12.5	-
WBC7	Light Pollution	78	20	2
WBC8	Noise Pollution	75.1	18.8	6.2

Preparation of the Reg 16 Neighbourhood Plan – Response to the Reg 14 Consultation

With broad support from the public across all aspects of the Reg 14 Plan, comments received from organisations, including statutory consultees were considered and a response from the qualifying body referenced in **Appendix D Table 3**. In addition, the resulting substantive text changes, as evidenced by comments received from statutory consultees, are outlined in the table below.

It should be noted that other minor changes not referenced in the Consultation Statement were made between the Reg 14 and Reg 16 document including formatting and annotating, referencing and information sources, sub-headings, consistency of terms, words and use of upper and lower case letters, spelling, grammar and accuracy of text, repeated text, emotive and superfluous words, correcting and/or clarifying conflicting statements, logical order of text, and ensuring maps, tables, images and supporting information were accurate.

Where planning policy or text has been amended based on statutory consultee advice for technical and compliance reasons, which was clearly supported by the community, we have incorporated within the main body of the Reg 16 document as community aspirations.

Table 2 - Showing Revisions Made Following Reg14 Consultation to arrive at the Pre-Submission Reg16 Version of the Plan

Reg 14 Text (Reg 14 para numbers)	Reg 16 Text (Substantive Changes shown in red text)	Evidence for Substantive Change - Comment reference numbers, Appx D, Table 3
VISION STATEMENT Our vision for Cirencester, in the period to 2033, is to pass on to future generations a historic and vibrant, welcoming, and friendly rural market town with a strong sense of community. It will be rich in heritage, character, leisure, and cultural opportunities. Cirencester will thrive by capitalising on its heritage and the character of its urban streets while facilitating sympathetic, high quality and sustainable economic and residential growth. This will deliver for all residents and users of the town while respecting the environment, responding to the climate emergency, and supporting employment and skills opportunities. The town will be well connected to a series of green parks and open spaces, nature, and the surrounding countryside, which will retain key attributes with improvements where appropriate. Recreational opportunities will be accessible to all. Opportunities for safe walking and cycling connections across all areas of the town will be improved as will active travel and public transport connections to its surrounding towns, villages, and countryside.	**VISION STATEMENT** Our vision for Cirencester, in the period to 2041, is to pass on to future generations an historic and vibrant, welcoming, and friendly rural market town with a strong sense of community and wellbeing. It will be rich in heritage, character, leisure, and cultural opportunities. Cirencester will thrive by capitalising on its heritage and the character of its urban streets while facilitating sympathetic, high quality and sustainable economic and residential growth. This will deliver for all residents and users of the town while respecting the environment, responding to the climate emergency, and supporting employment and skills opportunities. The town will be well connected to a series of green parks and open spaces, nature, and the surrounding countryside, which will retain key attributes with improvements where appropriate. Recreational opportunities will be accessible to all. Opportunities for safe walking and cycling connections across all areas of the town will be improved as will active travel and public transport connections to its surrounding towns, villages, and countryside.	2041 aligns with the emerging Local Plan. Ref 102

All areas of the town will have easy and accessible access to key services, including transport, with a more diverse cultural scene and sport and recreation facilities that meet the needs of a growing population.	All areas of the town will have easy and accessible access to key services, including transport, with a more diverse cultural scene and sport and recreation facilities that meet the needs of a growing population.	
AIMS AND OBJECTIVES 4.1 Ensure that land made available for new development better facilitates and maintains a vibrant, connected, economically active and sustainable town centre without adding to congestion or flood-risk.	Ensure that land made available for new development better facilitates and maintains a vibrant, connected, economically active and sustainable town centre without adding to congestion or flood-risk. [Policies TC1, AM1, QPR2, TMN1, LE1, LE2 and Chapter 10 Natural Environment refer]	
4.2 Create a convenient, robust, and flexible network of streets and spaces that promote all modes of active travel leading to reduced reliance on private vehicles. To support this, there is a need for enhanced public transport and an integrated mobility hub (IMH).	Create a convenient, robust, and flexible network of streets and spaces that promote all modes of active travel leading to reduced reliance on private vehicles. To support this, there is a need for enhanced public transport, an Integrated Mobility Hub and increasing safe pedestrian and cycle access within the town. [Policies TC1, AM1, AM2, AM4, AM6, QPR2 and TMN1 refer]	Ref 60
4.3 Improve connections of the outlying suburbs to the historic centre by footpaths, cycleways and public transport which are hindered by highway barriers and gaps in the walking and cycling routes. Overcome the highways barrier created by the A419 and A429 dual carriageways by putting in place direct, street level crossings for pedestrians and cyclists at each roundabout and subway.	Improve connections of the outlying suburbs to the historic centre by footpaths, cycleways and public transport which are hindered by highway barriers and gaps in the walking and cycling routes. Overcome the highways barrier created by the A419 and A429 dual carriageways by putting in place direct, street level crossings for pedestrians and cyclists at each roundabout and subway. [Policies AM1, QPR4, NE3 and LE4 refer]	
4.4 Put a '20 Minute Neighbourhood' model in place across the whole of Cirencester through the development of safe, sustainable, liveable, and mixed communities with active transport to jobs and essential services to meet the daily needs of the community.	Put a '20 Minute Neighbourhood' model in place across the whole of Cirencester through the development of safe, sustainable, liveable, and mixed communities with active transport to jobs and essential services to meet the daily needs of the community. [Policy TMN1 refers]	
4.5 Facilitate a reduction in carbon emissions and contribute to achieving the national goal of net zero.	Facilitate a reduction in carbon emissions and contribute to achieving the national goal of net zero. [Polices TC1, DBE1, DBE5 and WBC1 refer]	
4.6 Improve the sustainability of both conversion and new build development through use of low carbon materials, construction methods and facilitate low carbon running carbon costs in accordance with the Cotswold Design Code.	Improve the sustainability of both conversion and new build development through use of low carbon materials, construction methods and facilitate low carbon running costs in accordance with the Cotswold Design Code. [Policies DBE2, DBE5 and LE1 refer]	
4.7 Prioritise new residential development towards affordable homes and first-time buyers and avoid age-specific residences.	Prioritise new residential development towards affordable homes and first-time buyers and avoid age-specific residences. [Chapter 2, Chapter 5 and Policies DBE3 and DBE7 refer]	
4.8 Minimise future flood risk by protecting and, where possible, extending the functional floodplain; requiring new developments to provide multifunctional mitigation measures, such as sustainable urban drainage systems, to ensure that rainwater is attenuated within the site and supporting	Minimise future flood risk by protecting and, where possible, extending the functional floodplain; requiring new developments to provide multifunctional mitigation measures, such as sustainable urban drainage systems, to ensure that rainwater is attenuated within the site and supporting solutions to improve the management of the river flow on the	

solutions to improve the management of the river flow on the upper Churn to reduce flooding and drying up.	upper Churn to reduce flooding and drying up. Guidance on flooding and health from UK Health Security Agency refers. [Chapters 2, 10 and 12 refer]	
4.9 Maintain, protect, and enhance the distinctive Cotswold-rich visual character, views and heritage of Cirencester, its immediate historic setting and vistas and its connections to the surrounding areas.	Maintain, protect, and enhance the distinctive Cotswold-rich visual character, views and heritage of Cirencester, its immediate historic setting and vistas and its connections to the surrounding areas. [Policy DBE2 refers]	
4.10 Protect and enhance low carbon economic activity, to encourage the promotion of innovative and high-quality employment space. New employment premises to be part of both existing and new mixed-use neighbourhoods, moving away from employment zoning, subject to respect for the character, scale, and appearance of such areas. The retention of existing skills, and the development of new ones through youth apprenticeships and placement schemes through local business and Cirencester College.	Protect and enhance low carbon economic activity, to encourage the promotion of innovative and high-quality employment space. New employment premises to be part of both existing and new mixed-use neighbourhoods, moving away from employment zoning, subject to respect for the character, scale, and appearance of such areas. The retention of existing skills, and the development of new ones through youth apprenticeships and placement schemes through local business and Cirencester College. [Policies LE1 to LE4 refer]	
4.11 Protect, maintain, and enhance the natural environment, including local green spaces, parks, trees and green buffers, habitats, the River Churn, Gumstool Brook and all wildlife corridors alongside their connection to the wider landscape, promoting biodiversity and planting native species.	Protect, maintain, and enhance the natural environment, including local green spaces, parks, trees and green buffers, habitats, the River Churn, Gumstool Brook and all wildlife corridors alongside their connection to the wider landscape, promoting biodiversity and planting native species. [Policies NE1 to NE5 refer]	
4.12 Protect existing, and deliver new easily accessible, community infrastructure, including for primary health care, skills development, recreation, sport, leisure, and cultural enrichment, to fill existing gaps and support the future of Cirencester and its population growth.	Protect existing, and deliver new easily accessible, community infrastructure, including for primary health care, skills development, recreation, sport, leisure, and cultural enrichment, as well as education and academic provision, to fill existing gaps and support the future of Cirencester and its population growth. [Chapters 2 and 12 and Policies QPR3, TMN1 and LE3 refer]	Ref 114-116
4.13 Facilitate a reduction in noise and light pollution within the town and in new development whilst maintaining and improving air quality through a reduction in emissions.	Facilitate a reduction in noise and light pollution within the town and in new development whilst maintaining and improving air quality through a reduction in emissions. [Policies WBC1, WBC6 and WBC7 refer]	
4.14 Protect and improve public safety and the perception of feeling safe through urban design that increases the opportunity for community vigilance and design out crime	Protect and improve public safety and the perception of feeling safe through urban design that increases the opportunity for community vigilance and design out crime. [Policy WBC5 refers]	
CIRENCESTER TOWN CENTRE **POLICY TC 1 – TOWN CENTRE (GENERAL DEVELOPMENT)** Development proposals within the defined town centre area (Cotswold District Council Local Plan and Town Centre Master Plan refer) that are in accordance with the design and development principles described by the	**CIRENCESTER TOWN CENTRE** **POLICY TC1 – TOWN CENTRE AND AREAS OF DISTINCTIVE CHARACTER** Development proposals within the defined town centre area (Cotswold District Council Local Plan and Town Centre Master Plan refer) that are in	Ref 1-6, 61-62, 100

Neighbourhood Plan will be supported.	accordance with the design and development principles described by the Neighbourhood Plan will be supported. Development proposals which fall outside of the town centre area, but are within the boundary of an Area of Distinctive Character that are in accordance with the design and development principles described by the Neighbourhood Plan will be supported.	
POLICY TC 2 – TOWN CENTRE (AREAS OF CHANGE) Development proposals for development within any of the seven defined town centre character areas, that do not compromise, conflict or are in any other way incompatible with general development principles (Policy TC1) will be supported.	~~POLICY TC 2 – TOWN CENTRE (AREAS OF CHANGE)~~ ~~Development proposals for development within any of the seven defined town centre character areas, that do not compromise, conflict or are in any other way incompatible with general development principles (Policy TC1) will be supported.~~	Ref 1-6, 61-62
ACCESS AND MOVEMENT **POLICY AM 1 – THE CIRENCESTER SPOKE & WHEEL CYCLE NETWORK** Support will be given for the creation of a cycle and footpath network radiating from the town centre to the neighbourhoods (the spokes) and connecting neighbourhoods to each other (the wheel). Components of the system will include the 33 cycling routes and 23 walking routes proposed by the LCWIP within the town boundary, together with the following additional measures: a) Creation of a new walking and cycling link from rear of Tesco to The Steadings roundabout on Spratsgate Lane, via Siddington Church and Orchard Fields. This route will then connect into the new cycling and walking infrastructure within The Steadings neighbourhood and on to the RAU. b) Upgrade of the existing footpath between Harebushes and Bowling Green Lane to accommodate cycling journeys. c) Upgrade of the existing footpath between Bowling Green Lane and Whiteway View to accommodate cycling Journeys.	**ACCESS AND MOVEMENT** **POLICY AM 1 – THE CIRENCESTER SPOKE & WHEEL CYCLE AND FOOTPATH NETWORK** Support will be given for the creation of a cycle and footpath network radiating from the town centre to the residential neighbourhoods (the spokes) and connecting residential neighbourhoods to each other (the wheel). Components of the system will include the 33 cycling routes and 23 walking routes proposed by the Local Cycling and Walking Infrastructure Plan and where practical incorporate the additional benefit of a wildlife corridor to connect pockets of biodiversity. Development which incorporates or contributes in proportion to its scale, proposals outlined within the Cirencester Local Cycling and Walking Infrastructure Plan, will be supported. Development which creates or enhances street design, with good connections to and between local neighbourhoods will be supported. Measures designed to help overcome the barriers created by the A419 and A429 dual carriageways including the provision of safe, direct, street level, (at-grade) crossings will be supported. Development proposals which make cycle and footpath routes more welcoming, attractive and biodiversity-rich, that encourage usage and deliver on their potential to increase biodiversity connectivity will be supported.	Ref 7-11, 63-67, 98, 130

POLICY AM 2 – TOWN & COUNTRY CONNECTIONS a) The building of walking and cycling routes and other measures, that connect Cirencester with outlying areas, as proposed by the LCWIP, will be supported. b) The delivery of the walking and cycling routes listed in Table 1 will be supported.	**POLICY AM 2 – TOWN & COUNTRY CONNECTIONS** The building of walking and cycling routes and other measures, that connect Cirencester with outlying areas, as proposed by the LCWIP, will be supported. The delivery of the walking and cycling routes listed in Table 1 and projects which deliver the outcomes of the Connecting Places Strategy CPS4 South Cotswold (Gloucestershire County Council Local Transport Plan) will be supported.	Ref 7-11, 63-67, 98
POLICY AM 3 – THE PEDESTRIAN EXPERIENCE Support will be given to a range of coordinated measures designed to enhance the pedestrian experience across the Plan area, as follows: ~~a) Decluttering streets and removing obstacles.~~ b) Widening footways and improving surfaces. c) Enhanced street design including high quality surfaces, street furniture, tree planting and other greening initiatives. d) Town centre management, including curation of events and festivals. e) New signage and a wayfinding strategy. f) Rationalising and management of vehicle parking. g) Creating 'bumping spaces' for people to stop and meet. h) Moving most parking to the periphery rather than the centre of the town. i) Implement changes to operation of street network to remove unnecessary through traffic from the town centre.	**POLICY AM 3 – THE PEDESTRIAN EXPERIENCE** Development proposals which bring forward measures to enhance the pedestrian experience will be supported. These measures include: a)widening footways and improving surfaces; b)enhanced street design including high quality surfaces, street furniture, tree planting and other greening initiatives; c)town centre management, including curation of events and festivals; d)new signage and a wayfinding strategy; e)rationalising and management of vehicle parking; f)creating 'bumping spaces' for people to stop and meet; g)moving all day and long-stay parking towards the periphery from the centre of the town; h)implementing changes to operation of street network to remove unnecessary through traffic and increase safe pedestrian and cycle access within the town; i)decluttering and removal of obstacles; j)new residential areas being designed to minimise traffic speed at or below 20mph.	Ref 7-11, 60, 63-67, 98
POLICY AM 4 – INTEGRATED MOBILITY HUB (IMH) a) Support will be given for the development of an integrated mobility hub (IMB) that includes the following elements: ~~1) Long distance coaches to London, London airports, and the Midlands.~~ ~~2) Regional buses to Bristol, Oxford, Cheltenham, Gloucester, Bath, and Swindon.~~ 3) Local buses. ~~4) Kemble railway shuttle or very light rail.~~ 5) Taxis. ~~6) Car Hire & Car Club.~~ 7) Cycle shelters. 8) Bike and e-bike hire. 9) Car passenger drop-off and pick-up.	**POLICY AM4 – INTEGRATED MOBILITY HUB** Support will be given for the development of an integrated mobility hub that includes ease of access to, and accommodation of: a) local buses; b) regional and national coaches; c) very light rail, including other emerging transport modes; d) taxis; e) car hire/community car club; f) cycle and e-bike hire; g) cycle racks/shelters and repair stations; h) passenger drop-off and pick-up; i) demand responsive transport.	Ref 7-11, 63-67, 98

~~b) The preferred location for the IMH will be determined by the selection criteria set out in this Plan.~~	Proposals for an integrated mobility hub will be supported where viability principles outlined within this Plan have been taken into consideration.	
POLICY AM 5 – STRATEGIC CONNECTIONS & TRANSPORT LINKS ~~Effective connections through public transport links with towns which are economically important to Cirencester will be supported. These include:~~ ~~a) Level 1 Kemble – Strong public transport services and safe at grade cycle routes are strategically important to Cirencester.~~ ~~b) Level 2 Swindon, Gloucester, Cheltenham – Strong public transport services and connections to the national rail system through Kemble rail station.~~ ~~c) Level 3 – Oxford and Stroud – Strong public transport services and connections are important~~	**POLICY AM5 – STRATEGIC CONNECTIONS & TRANSPORT LINKS** Development which creates or enhances public transport links to Kemble will be supported. Development which creates or enhances public transport links to places which are socially and economically important to Cirencester will be supported.	Ref 7-11, 63-67, 98
	POLICY AM6 – SUSTAINABLE AND ACTIVE TRAVEL Development which offers a genuine choice of sustainable and active travel options will be supported in accordance with the travel hierarchy, both within the development and beyond its boundary, as it connects with its surroundings.	Ref 7-11, 63-67
DESIGN & BUILT ENVIRONMENT **POLICY DBE 1 – DESIGN QUALITY** ~~The design of new buildings and their settings should be of an exceptional quality and embody the highest standards in building and landscape architecture. This creation of successful public realm spaces begins at the principal layout stage where the integration of open courtyards and their connection to pedestrian access routes, create animated, social spaces with a legible and appealing sense of place. Proposals will need to show both a deep understanding of the defining characteristics of Cirencester and demonstrate how these qualities are expressed within the new urban form. They should use materials, land, energy, and water efficiently and be designed for longevity and minimise pollution. New developments should enhance the local character, although this does not imply simply duplicating existing developments which, in themselves, may not be of good quality.~~ a) All new development proposals should have regard ~~for the Design Checklist outlined in the Plan which has been produced specifically for the Cirencester context.~~ b) Where a development is proposed in, or on the edge of an existing settlement, all new routes will respect their place in the hierarchy within the overall network. c) The design of new development should take into account, the need to define and integrate the transition between areas of different character.	**DESIGN & BUILT ENVIRONMENT** **POLICY DBE1 – DESIGN QUALITY** a) All new development proposals should have regard to the Cirencester Design Guidelines and the Cotswold Design Code. b) Where a development is proposed in, or on the edge of an existing settlement, any new routes will respect their place in the hierarchy within the overall network. c) The design of new development should take into account, the need to define and integrate the transition between areas of different character. d) Where the corners of new buildings lie on the sight lines and axial views, consideration should be given to the inclusion of architectural features that form focal points. e) Where practicable, development should incorporate publicly accessible pedestrian routes in order to maximise permeability through the town. This applies particularly where existing routes can be linked. f) New developments should not be disproportionate in scale to adjoining buildings in the locality, unless warranted by its proposed use and position on the street.	Ref 12-26, 68, 101, 107, 117-118, 131

d) Where the corners of new buildings lie on the sight lines and axial views, consideration should be given to the inclusion of architectural features that form focal points~~, e.g. turrets, oriel windows and projected gables.~~ e) Buildings should incorporate publicly accessible pedestrian routes in order to maximise permeability through the town. This applies particularly where existing routes can be linked. f) New developments should not be disproportionate in scale to adjoining buildings in the locality, unless warranted by its proposed use and position on the street.	g) Innovation in building design and materials in a way that supports local distinctiveness and other objectives for good design, as well as sustainable development and net zero will be supported. h) New buildings within the defined Town Centre and Areas of Distinctive Character should not be more than 12 metres in height i.e. from ground level to the ridge, three storey in height, (with use of the roof space with dormer windows as a useable fourth storey habitable living space being accepted) i.e. ridge heights to not exceed those of neighbouring buildings which set the appropriate height for a new or extended building and that the proposed design causes no impairment of light or visual impact.	
g) Innovation in building design and materials in a way that supports local distinctiveness and the other objectives for good design and sustainable development will be supported. h) Buildings should not be more than 12 metres in height i.e. from ground level to the ridge, three storeys in height, (with use of the roof space with dormer windows as a useable fourth storey habitable living space being accepted) i.e. ridge heights to not exceed those of neighbouring buildings which set the appropriate height for a new or extended building and that the proposed design causes no impairment of light or visual impact.		
POLICY DBE 2 – PROTECTION OF LANDSCAPE & TOWNSCAPE VIEWS Development proposals should demonstrate ~~through a Design and Access Statement or Visual Impact Statement~~ how they will protect and enhance the following views, identified as important to the landscape and townscape of Cirencester: a) Rear of the former Watermoor Primary School: The school is currently empty and vulnerable to development. The 'glimpse' of the church spire is enjoyed as you approach from higher ground behind the premises. Roof line or development on the playing field could and would affect this. b) Churn Meadow Stratton: Towards the town, enjoyed by dog walkers and accessible for all, it is also a valued green space. c) Tower Street towards the St John Baptist Parish Church: A particularly significant central view, any development or change to the Police Station building could affect this approach with the Forum Car Park on the right. d) The rear of the former House of Fraser building: The back of the former House of Fraser building in the Market Place, which could be described as a mismatch of previous development, still presents an aspect of the	**POLICY DBE2 – PROTECTION OF LANDSCAPE & TOWNSCAPE VIEWS** Development proposals should demonstrate how they will protect and enhance the following views, identified as important to the landscape and townscape of Cirencester: a) Rear of the former Watermoor Primary School: The school is currently empty and vulnerable to development. The 'glimpse' of the church spire is enjoyed as you approach from higher ground behind the premises. Roof line or development on the playing field could and would affect this. b) Churn Meadow Stratton: Towards the town, enjoyed by dog walkers and accessible for all, it is also a valued green space. c) Tower Street towards the St John Baptist Parish Church: A particularly significant central view, any development or change to the Police Station building could affect this approach with the Forum Car Park on the right. d) The rear of the former House of Fraser building: The back of the former House of Fraser building in the Market Place, which could be described as a mismatch of previous development, still presents an aspect of the St John	Ref 12-26, 101, 107

St John Baptist Parish Church that invites anticipation of what is to come and could be affected by changes to the rear of the building. e) Somerford Road walking towards Sheep Street: Commercial buildings are probably unlikely to change but behind this aspect is Querns Lane with an empty large shop which currently has the potential to be developed into residential town houses or flats. f) Riverside Walk: Much valued Riverside Walk with open fields towards Stratton which enhance the area and its emphasis on wildlife. Probably prone to flooding and therefore unlikely to be built on but still noted.	Baptist Parish Church that invites anticipation of what is to come and could be affected by changes to the rear of the building. e) Somerford Road walking towards Sheep Street: Commercial buildings are probably unlikely to change but behind this aspect is Querns Lane with an empty large shop which currently has the potential to be developed into residential town houses or flats. f) Riverside Walk: Much valued Riverside Walk with open fields towards Stratton which enhance the area and its emphasis on wildlife. Probably prone to flooding and therefore unlikely to be built on but still noted.	
g) Powell's School Playing Fields from the Barton Allotments: Open aspect from extensive school playing fields which can 'sometimes' offer potential to reduce in size and zone for development. h) Approaching town from Gloucester Road: Could be compromised with any development of the commercial garage site on the left, or petrol station on the right of the distant eyeline.	g) Powell's School Playing Fields from the Barton Allotments: Open aspect from extensive school playing fields which can 'sometimes' offer potential to reduce in size and zone for development. h) Approaching town from Gloucester Road: Could be compromised with any development of the commercial garage site on the left, or petrol station on the right of the distant eyeline.	
POLICY DBE 3 – CONVERSION OF EXISTING PROPERTIES a) Due to the negative impact on the appearance and character of the town centre and where planning permission is required, proposals for the merging of multiple units within Cirencester Town Centre will need to show: 1) how it will minimise any detrimental impact on the Conservation Area 2) that the tenant or occupier will be providing much needed services b) Redevelopment proposals will be supported where, through the design of the ground floor retail units, small, local, and/or independent traders are encouraged to locate in the town centre. c) The conversion to residential of under-utilised commercial upper floors across the town centre will be supported to create a more vibrant and vital town centre, as appropriate to the nature of the development concerned. Support will be given if proposals are to a high design standard, respect the scale of neighbouring buildings and the ground floor continues to provide an active and animated frontage onto the street. d) The sub-division of houses over 200m2 gross internal floor area to create a studio, one, or two bedroomed self-contained apartments will be supported, subject to design quality.	**POLICY DBE3 – REDEVELOPMENT AND CONVERSION OF EXISTING PROPERTIES** Proposals for the merging of multiple units within Cirencester town centre will need to minimise any negative impact on the appearance and character of the town centre. a) Redevelopment proposals will be supported where, through the design of the ground floor retail units, small, local, and/or independent traders are encouraged to locate in the town centre. b) The conversion to residential of under-utilised commercial upper floors across the town centre will be supported to create a more vibrant and vital town centre, as appropriate to the nature of the development concerned. Support will be given if proposals are to a high design standard, respect the scale of neighbouring buildings and the ground floor continues to provide an active and animated frontage onto the street. c) The sub-division of houses over 200m2 gross internal floor area to create a studio, one, or two bedroomed self-contained apartments will be supported, subject to design quality, especially bin storage and parking/cycle storage.	Ref 12-26, 101, 108

POLICY DBE 4 – PROTECTION OF NON-DESIGNATED HERITAGE ASSETS ~~a) The identified Non-Designated Heritage Assets (NDHA) shown on the Map and listed at Appendix 5 make a positive contribution to the townscape and will be protected from inappropriate demolition or alteration.~~ ~~b) Any new development or alteration to an existing structure will be required in its design, scale, and materials to preserve or enhance the setting of heritage assets, whether designated or undesignated, and the historic character of the town, and to have regard to the guidance in the Cirencester Streetscape Strategy.~~ ~~c) Any application for new development or alteration to an existing structure should include an appraisal of the site and its surroundings, with drawings showing its relationship to heritage assets, whether designated or undesignated, including roofscapes and views.~~ ~~d) The application should clearly explain how the development proposals have taken account of the findings of such an appraisal.~~	**POLICY DBE4 – PROTECTION OF NON-DESIGNATED HERITAGE ASSETS** The buildings and structures listed in Appendix x, as shown on the Map on page xx, are identified as Non-Designated Heritage Assets and the appropriate local and national planning policies shall be applied to them. Other NDHAs may be identified subsequently and added to the list.	Ref 12-26, 101, 109
POLICY DBE 5 – NET-ZERO & ENERGY EFFICIENCY MEASURES IN THE DESIGN & CONSTRUCTION PROCESS a) Proposals should demonstrate that solutions to minimise energy consumption and greenhouse gas emissions have been adopted and included at each stage of the design and construction process. b) Proposals should demonstrate how greenhouse gas emissions are minimised and reduced as part of the site identification and selection process, site layout and orientation, construction methodology, thermal properties of materials, choice of glazing, choice of construction materials, avoidance of materials harmful to the environment, use of local materials and people, incorporation of sustainable modes of transport, integration with existing or planned sustainable travel networks, recharging points for electric vehicles, flexible and adaptable space, water efficiency, incorporation of systems to collect rain and grey water, use of permeable surface and sub-base materials. c) Proposals should follow an energy hierarchy as outlined in the supporting text. d) Non-residential development, design and construction should comply with the BREEAM standard and achieve an 'excellent' accreditation or an alternative standard which achieves the same or better outcome. ~~e) Carbon off-setting will not be permitted.~~	**POLICY DBE5 – NET-ZERO & ENERGY EFFICIENCY MEASURES IN THE DESIGN & CONSTRUCTION PROCESS** a)Proposals should demonstrate that solutions to minimise energy consumption, greenhouse gas emissions and embodied carbon have been adopted and included at each stage of the design and construction process through a Construction Environmental Management Plan. b)Proposals should demonstrate how energy consumption, greenhouse gas emissions and embodied carbon is minimised and reduced as part of the site identification and selection process, site layout and orientation, construction methodology, thermal properties of materials, choice of glazing, choice of construction materials, avoidance of materials harmful to the environment, use of local materials and people, incorporation of sustainable modes of transport, integration with existing or planned sustainable travel networks, EV charging points for electric vehicles, flexible and adaptable space, water efficiency, incorporation of systems to collect rain and grey water, use of permeable surface and sub-base materials. c) Proposals should follow an energy hierarchy as outlined in the supporting text. d) Non-residential development, design and construction should comply with the BREEAM (Building Research Establishment Environmental Assessment Method) standard and achieve an 'excellent' accreditation or an alternative standard which achieves the same or better outcome.	Ref 12-26, 101, 110, 119, 132
POLICY DBE 6 – ENERGY USE IN NEW BUILDINGS a) New residential developments should not use fossil fuels on-site for space heating or hot water provision.	**POLICY DBE6 – ENERGY USE IN NEW BUILDINGS** a) New residential developments should not use fossil fuels on-site for space heating or hot water provision.	Ref 12-26, 101, 110

b) New residential developments should achieve an Energy Use Intensity (EUI) (or metered energy use) of no more than 35 kWh/m?/year for regulated and unregulated demand assessed using energy modelling such as a Passivhaus Planning Package or similar. This is based on the total amount of energy needed within a residential building per year. c) New residential developments should achieve a space heating demand of less than 15 kWh/m?/year assessed using energy modelling such as Passivhaus Planning Package or similar. This is based on the level of heat energy needed within a residential building per year to maintain a regular temperature. d) Non-residential developments should achieve an energy utilisation intensity or metered input of 55 to 65 kWh/m?/year (subject to building use) and a space heating demand of less than 15 kWh/m?/year assessed using energy modelling such as Passivhaus Planning Package or similar.	b)New residential developments should achieve an Energy Use Intensity (EUI) (or metered energy use) of no more than 35 kWh/m²/year for regulated and unregulated demand assessed using energy modelling such as a Passivhaus Planning Package or similar. This is based on the total amount of energy needed within a residential building per year. c) New residential developments should achieve a space heating demand of less than 15 kWh/m²/year assessed using energy modelling such as Passivhaus Planning Package or similar. This is based on the level of heat energy needed within a residential building per year to maintain a regular temperature. d) Non-residential developments should achieve an energy utilisation intensity or metered input of 55 to 65 kWh/m²/year (subject to building use) and a space heating demand of less than 15 kWh/m²/year assessed using energy modelling such as Passivhaus Planning Package or similar.	
e) On-site renewable energy should meet all the energy consumption needs of new residential buildings. f) The strategy for metering, monitoring, reporting, energy calculations, and predicted energy use should be confirmed as part of the planning submissions for outline and detailed grant of permission and reconfirmed before the commencement of construction. g) Variations on the requirements of this policy will be allowed only under exceptional circumstances where in complying with the above the development causing harm, or harm to the character of the wider area, or extraordinary reasons, clearly demonstrated where the standards above cannot be achieved.	e) The design of developments should demonstrate that on-site renewable energy delivers annual heating and lighting needs of new residential buildings. f) The strategy for metering, monitoring, reporting, energy calculations, and predicted energy use should be confirmed as part of the planning submissions for outline and detailed grant of permission and reconfirmed before the commencement of construction. g) Variations on the requirements of this policy will be allowed only under exceptional circumstances where in complying with the above the development causing harm, or harm to the character of the wider area, or extraordinary reasons, clearly demonstrated where the standards above cannot be achieved.	
DBE 7 – HOMES IN MULTIPLE OCCUPATION Proposals for the development of new Homes in Multiple Occupation (HMOs) will be supported where the development: a) Does not harm the residential amenity or character of the locality as a result of excessive noise. b) Does not increase levels of on-street parking, that cannot reasonably be regulated through parking control measures. c) Does not lead to inadequate off-street storage of refuse and bicycles. d) Is on a site in an electoral ward where under 10% of homes are currently HMOs.	**DBE7 – HOMES IN MULTIPLE OCCUPATION** Proposals for the development of new Homes in Multiple Occupation (HMOs) will be supported where the development: a)Does not harm the residential amenity or character of the locality as a result of excessive noise. b)Does not increase levels of on-street parking, that cannot reasonably be regulated through parking control measures. c)Does not lead to inadequate off-street storage of refuse and bicycles. d)Is on a site in an electoral ward where under 10% of homes are currently HMOs.	Ref 12-26, 101, 113, 120

e) Has no existing HMO within 5 dwellings on either side of the property or on the opposite side of the street, within 10 dwellings.	e)Has no existing HMO within 5 dwellings on either side of the property or on the opposite side of the street, within 10 dwellings.	
QUALITY PUBLIC REALM POLICY **QPR1 – ILLUMINATED SIGNAGE** Unless it can be demonstrated that the introduction of free standing and wall mounted structures with illuminated advertisements have no detrimental visual or acoustic impact on the town centre Conservation Areas i.e. that they are contained discretely within the fabric of buildings, proposals to introduce these or similar structures will not be supported.	**QUALITY PUBLIC REALM POLICY** **POLICY QPR1 – ILLUMINATED SIGNAGE** Unless it can be demonstrated that the introduction of free standing and wall mounted structures with digital or illuminated advertisements have no detrimental visual or acoustic impact on the town centre Conservation Areas i.e. that they are contained discretely within the fabric of buildings, proposals to introduce these or similar structures will not be supported.	Ref 27
POLICY QPR2 – QUALITY STREETS & SPACES a) The network of historic streets, parks, gardens, and spaces across the town will be protected and enhanced. Development proposals that would have an unacceptable detrimental impact on the existing historic network will not be supported.	**POLICY QPR2 – QUALITY STREETS & SPACES** a)Development proposals that protect and enhance the network of historic streets, parks, gardens, and public open spaces across the Plan area will be supported.	Ref 27
b) Development proposals will be supported which use the palette of heritage materials outlined in the Cirencester Town Centre Public Realm Design Code. ~~c) Where appropriate, new developments across the Plan area should contribute to the delivery of projects that help implement this policy.~~	b)Development proposals within the town centre boundary and areas of distinctive character as identified within Policy TC1 which use the palette of heritage materials outlined in the Cirencester Town Centre Public Realm Design Code will be supported.	
POLICY QPR 3 – SOCIAL & CIVIC SPACES Where appropriate, new developments will be supported where they provide a clear network of well-designed social and civic spaces that can help support the cultural, social, and economic life of the town.	**POLICY QPR3 – SOCIAL & CIVIC SPACES** Where appropriate, new developments will be supported where they provide a clear network of well-designed social and civic spaces that can help support the cultural, social, and economic life of the town.	Ref 27
POLICY QPR 4 – HERITAGE TRAILS & WAYFINDING SYSTEMS Insofar as planning permission is required, proposals for heritage trails, wayfinding systems and the improved signposting of existing pedestrian and cycle routes within the town will be supported. Proposals that would facilitate better connections between the town centre, the surrounding areas and the wider countryside will be particularly encouraged.	**POLICY QPR4 – HERITAGE TRAILS & WAYFINDING SYSTEMS** Insofar as planning permission is required, proposals for heritage trails, wayfinding systems and the improved signposting of existing pedestrian and cycle routes within the town will be supported. Proposals that would facilitate better connections between the town centre, the surrounding areas and the wider countryside will be particularly encouraged.	Ref 27
THE 20 MINUTE NEIGHBOURHOOD **POLICY TMN 1 – 20 MINUTE NEIGHBOURHOODS** a) Development proposals which contribute to the 20-minute neighbourhood model, will be supported. The contribution made should be in proportion to the scale of the associated development. b) Proposals that remove barriers to cycling and walking across the Plan area will be supported. ~~c) Measures designed to help overcome the barriers created by the A419 and A429 dual carriageways including the provision of safe, direct, street level (at grade) crossings will be supported.~~	**THE 20 MINUTE NEIGHBOURHOOD** **POLICY TMN1 – 20 MINUTE NEIGHBOURHOODS** Development proposals which in proportion to size and scale, support and extend the 20-minute neighbourhood model, will be supported where the following land use features are integrated or delivered: a) diverse and affordable homes; b) well-connected paths, streets, and spaces, with safe, direct, street level (at grade) cycle ways and footpaths; c) key local daily facilities;	Ref 28-31, 69, 133-134

~~d) New developments should offer a genuine choice of sustainable and active travel in accordance with the agreed travel hierarchy, both within the new development and beyond the boundaries as it connects with the surroundings.~~ ~~e) Incorporate or contribute in proportion to the scale of the development to the walking and cycle routes within the town boundary and identified in the Cirencester Local Cycling and Walking Infrastructure Plan (LCWIP).~~ ~~f) Street designs which provide direct, good connections to the existing or future neighbourhoods bordering the development will be a requirement of all development proposals.~~ ~~g) New residential areas will be designed in a way that keeps traffic speed at and below 20mph.~~	d) sports, well-being and community health facilities. Proposals which enhance the provision of Key Local Daily Facilities across the Plan area will be supported, where they address a deficit shown by the Key Local Daily Facility Deficits Map or other evidence. Planning applications which remove barriers to walking and cycling in residential neighbourhood areas and across the town will be supported.	
THE NATURAL ENVIRONMENT **~~POLICY NE 1 – BIODIVERSITY NET GAIN~~** ~~Development will be expected to demonstrate, in accordance with the Environment Act of 2021, a minimum 10% biodiversity net gain on site or replace as near to the development as possible.~~	**THE NATURAL ENVIRONMENT** **POLICY NE1 - NATURAL AND SEMI-NATURAL HABITAT SCHEMES** Support will be given for the extension of natural and semi-natural habitat areas of the town, particularly on the periphery of green spaces, verges and edges of footpaths combined with the retention of hedgerows.	Ref 32-43, 70-97
~~POLICY NE 2 – REWILDING SCHEMES~~ ~~Support will be given for the extension of wilding areas of the town, particularly on the periphery of green spaces, verges and edges of footpaths combined with the retention of hedgerows.~~	POLICY NE2 – WILDLIFE CORRIDORS a) Development proposals should maintain the integrity of existing wildlife corridors whilst creating new opportunities to connect areas of habitat through planting and links. b) Existing wildlife corridors within the town should not be separated or fragmented by changes to green infrastructure and habitats without justification and compensation with new connections.	Ref 32-43, 70-97
POLICY NE 3 – WILDLIFE CORRIDORS a) Development proposals should maintain the integrity of existing wildlife corridors whilst creating new opportunities to connect areas of habitat through planting and links. b) Existing wildlife corridors within the town should not be separated or fragmented by changes to green infrastructure and habitats without justification and compensation with new connections.	**POLICY NE3 – GREEN INFRASTRUCTURE PROTECTION & ENHANCEMENT** a)Development proposals should protect the existing green infrastructure of Cirencester and remove barriers to connectivity, creating new opportunities, connections, and extensions. b)Green infrastructure opportunities and requirements, as defined by the Building with Nature Standards, should be considered at the earliest stages of all new development planning proposals, as an integral part of the town's provision, taking into account the most suitable locations and types. c)The removal of existing green infrastructure within the town will be resisted and should be justified and compensated for, with appropriate replacement if permitted.	Ref 32-43, 70-97, 127-128

	d) Development proposals will be resisted on designated biodiversity sites and core ecological networks as defined by the Gloucestershire Nature Recovery Network.	
POLICY NE 4 – GREEN ~~& BLUE~~ INFRASTRUCTURE PROTECTION & ENHANCEMENT a) Development proposals should protect the existing green ~~and blue~~ infrastructure of Cirencester alongside creating new opportunities, connections, and extensions. b) Green ~~and blue~~ infrastructure opportunities and requirements should be considered at the earliest stages of all new development planning proposals, as an integral part of the town's provision, taking into account the most suitable locations and types. c) The removal of existing green ~~and blue~~ infrastructure within the town will be resisted and should be justified and compensated for, with appropriate replacement if permitted. d) Developers will be required to justify the removal of any area of highway verge to create or extend vehicle access to property and land. ~~e) Private households will be encouraged to avoid replacing lawns with hard landscaping.~~	POLICY NE4 – LOCAL GREEN SPACE DESIGNATIONS Local Green Spaces in Cirencester identified on the Map and scheduled in Table 2 will be protected from development except in very special circumstances.	Ref 32-43, 64, 70-97
~~**POLICY NE 5 – FLOOD MITIGATION**~~ ~~Development proposals should demonstrate how they will mitigate flood risk through design and landscape measures, as combined with other appropriate strategies such as permeable paving and sustainable drainage systems.~~	POLICY NE5 – GREEN GAPS Proposals that result in the loss of current boundaries and buffers of undeveloped land between Cirencester and its adjacent settlements should compensate for this loss through appropriate replacement landscaped areas.	Ref 32-43, 70-97
~~**POLICY NE 6 – LOCAL GREEN SPACE DESIGNATIONS**~~ ~~a) Local Green Spaces in Cirencester identified on the Local Green Spaces Map, scheduled in Table 2 and detailed in Appendix 4 will be protected from built development except in very special circumstances.~~ ~~b) Community green or open spaces that contain a building which needs improving or removing will be allowed to be developed if the proposed work is for the benefit of the community and will preserve the local significance of the space for which it was designated.~~		Ref 32-43, 70-97, 121
~~**POLICY NE 7 – GREEN GAPS**~~ ~~Development proposals should maintain a green gap between Cirencester and adjacent settlements. Proposals that result in the loss of peripheral boundaries and buffers of undeveloped land between Cirencester and its adjacent settlements should compensate for this loss through appropriate replacement landscaped areas.~~		Ref 32-43, 70-97

THE LOCAL ECONOMY **POLICY LE1 – PROTECT & ENHANCE ECONOMIC ACTIVITY** a) Existing economic activity (including employment, tourism, and retail uses) and premises across the town centre will be protected and enhanced. b) Existing economic activity in the neighbourhoods, particularly key local facilities identified as community assets within Appendix 3 and associated information, will be protected, and enhanced. c) Any loss of employment uses, or premises, will not be supported unless it is accompanied by clear evidence demonstrating that the site or premises ~~is not currently viable and that an appropriate alternative site or premises can be identified within the Plan area. The evidence required will be determined by the existing use and its site.~~ ~~d) Flexible growth and adaptation of existing employment areas (e.g. Love Lane) across the Plan area through the sensitive introduction of new low carbon economic uses and activities, will be encouraged.~~	**THE LOCAL ECONOMY** **POLICY LE1 – PROTECT & ENHANCE ECONOMIC ACTIVITY** a)In so far as planning permission is required, existing economic activity (including employment, tourism, and retail uses) and premises across the town centre will be protected and enhanced. b)In so far as planning permission is required, existing economic activity in the neighbourhoods, particularly key local daily facilities identified as community assets within Appendix x and associated information, will be protected, and enhanced. c)Subject to permitted development rights, any loss of employment uses, or premises, will not be supported unless it is accompanied by clear evidence demonstrating that the site or premises has been actively marketed for employment use and is not currently viable. d)Introduction of new low carbon economic uses and activities will be encouraged.	Ref 44-48, 111
POLICY LE2 – PROVISION FOR INNOVATIVE WORK SPACES, NEW & SMALL BUSINESSES a) Development proposals that provide innovative hybrid and/or mixed-use working spaces which encourage creative small businesses or community uses will be supported. b) Support will be given for developments on sites that provide for: 1) start-up businesses by enabling low cost facilities in cooperative clusters; ~~2) working from home, enabling extensions and small new buildings;~~ 3) enabling microbusinesses.	**POLICY LE2 – PROVISION FOR INNOVATIVE WORK SPACES, NEW & SMALL BUSINESSES** a)Development proposals that provide innovative hybrid and/or mixed-use working spaces which encourage creative small businesses or community uses will be supported. b)Support will be given for developments on sites that provide accommodation for start-up businesses by enabling low-cost facilities in cooperative clusters and microbusinesses.	Ref 44-48
POLICY LE3 – SKILLS DEVELOPMENT a) Development proposals will be supported where they provide opportunities for training, the obtaining of skills, and education. b) Proposals that provide enhancements to existing skills and training facilities will be supported, including the encouragement of local apprenticeships and T-Level placements	**POLICY LE3 – SKILLS DEVELOPMENT** a)Development proposals will be supported where they provide opportunities for training, the obtaining of skills, and education. b)Proposals that provide enhancements to existing skills and training facilities will be supported, including the encouragement of local apprenticeships, T-Level and other work related placements.	Ref 44-48
POLICY LE4 – NEW EMPLOYMENT PREMISES & DESIGN QUALITY a) Proposals for new employment development outside existing industrial and employment areas should through its design, scale, and materials provide an attractive business environment which takes account of the character and appearance of Cirencester.	**POLICY LE4 – NEW EMPLOYMENT PREMISES & DESIGN QUALITY** a)Proposals for new employment development outside existing industrial and employment areas should through its design, scale, and materials provide an attractive business environment which takes account of the character and appearance of Cirencester.	Ref 44-48

b) New employment and industrial proposals should demonstrate through a Design & Access Statement how they respect the character and appearance of the neighbourhood area. Where their location provides practical opportunities to do so, development proposals will be supported where, as appropriate to their scale and location, they provide clear and convenient connections with the town centre and create public access to the surrounding areas.	b) New employment and industrial proposals should demonstrate through a Design & Access Statement how they respect the character and appearance of the neighbourhood area. Where their scale and location provides practical opportunities to do so, development proposals will be supported where they provide clear and convenient connections with the town centre and create public access to the surrounding areas.	
WELLBEING & COMMUNITY **POLICY WBC 1 – AIR QUALITY** ~~a) Measures that reduce traffic volume near educational establishments, particularly at peak times, will be supported.~~ b) Developments that encourage idling traffic, such as drive-through food outlets, within the Plan area ~~will be resisted.~~ ~~c) Measures that reduce vehicle movement in the town centre's historic streets will be supported, particularly Park Street, Dyer Street, Thomas Street, and the Market Place.~~ d) ~~Development construction traffic~~ will be required to monitor air quality, including particulates, to ensure ~~net neutral~~ is achieved throughout site development, and if necessary, instigate mitigation. e) Development proposals should be operationally designed in a way that minimises any impact on public health through emissions and dust. ~~f) Monitoring of air quality within the town should be increased through locations identified as having greater risk of deterioration and particularly near educational establishments.~~	**WELLBEING & COMMUNITY** **POLICY WBC1 – AIR QUALITY** a)Developments that encourage idling traffic, such as drive-through food outlets, within the Plan area will not be supported. b)Developers will be required to monitor air quality, including particulates, to ensure that an Air Quality Neutral standard is achieved throughout site development for building and construction traffic emissions, and if necessary, to instigate mitigation. c)Development proposals should be operationally designed in a way that minimises any impact on public health through emissions and dust.	Ref 49-59
~~**POLICY WBC 2 – HEALTH IMPACT ASSESSMENTS**~~ ~~a) Health Impact Assessments (HIAs) will be required in the design and access statement of developments over 10 residential units to support the 20 Minute Neighbourhood principle.~~ ~~b) A rapid HIA assessment for developments of fewer than 10 homes will be required, or where the development is over 10 homes or greater than 10,000m2 of commercial space a comprehensive HIA assessment will be required.~~		Ref 49-59, 112
POLICY WBC 3 – EQUAL ACCESS TO GREEN SPACES FOR ALL a) Development proposals should accommodate the needs of all users, including those with mobility needs, in the design and landscaping of public spaces.	**POLICY WBC 2 – EQUAL ACCESS TO PUBLIC OPEN SPACES FOR ALL** a)Development proposals should accommodate the needs of all users, including those with mobility needs, in the design and landscaping of public open spaces.	Ref 49-59

b) Access to new and existing green infrastructure should be provided through well-connected paths of appropriate widths, smooth non-slip surfaces, and navigation aids such as signs.	b)Access to new and existing public open spaces should be provided through well-connected paths of appropriate widths, smooth non-slip surfaces, and navigation aids such as signs.	
POLICY WBC 4 – ACCESS TO PLAY SPACES a) Developments of greater than 10 houses should provide appropriate play spaces for the site size, easily accessible to all users, ~~which are maintained as part of ongoing social management plans.~~ b) The development of new fitness trails and outdoor gyms in open green spaces, where appropriate, will be supported, especially those that connect to the cycling 'wheel and spoke' network of the town.	**POLICY WBC 3 – ACCESS TO PLAY SPACES** a) Developments of greater than 10 houses should provide or enhance nearby play spaces for the site size, easily accessible to all users. b)Provision of new publicly accessible play spaces should be maintained by the Town Council or a local community management trust. c)The development of new fitness trails and outdoor gyms in open green spaces, where appropriate, will be supported, especially those that connect to the cycling 'spoke and wheel' network of the town.	Ref 49-59
POLICY WBC 5 – COMMUNITY FACILITIES a) Existing community facilities that are designated as Assets of Community Value (ACV) will be protected from change of use or closure. b) The loss of existing community buildings (Use Class D1) ~~will be resisted~~ unless it can be demonstrated that demand within the locality for the facility no longer exists. c) Flexible multi-functional spaces that allow for the widest possible use and activity, particularly daily community needs which are missing, will be supported. ~~d) Development proposals will be required to demonstrate the provision of community infrastructure in proportion to the increased population brought about by that development, particularly recreation and primary care, either on site or off-site through developer contributions.~~	**POLICY WBC 4 – COMMUNITY FACILITIES** a)The loss of existing community buildings (Use Class D1) will not be supported unless it can be demonstrated that the facility is no longer viable. b)Flexible multi-functional spaces that allow for the widest possible use and activity, particularly daily community needs which are missing, will be supported.	Ref 49-59
POLICY WBC 6 – DESIGNING OUT CRIME a) Development plans should demonstrate in the design and access statement how principles that deter crime have been incorporated. b) Support will be given for the development of upper floor empty town centre premises to residential use to increase crime vigilance and create less opportunity for unobserved crime and anti-social behaviour. c) Support will be given for prevention of crime opportunities in the urban built environment by improvements to hidden or dark pedestrian footpaths.	**POLICY WBC 5 – DESIGNING OUT CRIME** a)Development plans should demonstrate in the design and access statement how principles that deter crime have been incorporated. b)Support will be given for the development of upper floor empty town centre premises to residential use to increase crime vigilance and create less opportunity for unobserved crime and anti-social behaviour. c)Support will be given for prevention of crime opportunities in the urban built environment by improvements to hidden or dark pedestrian footpaths.	Ref 49-59
POLICY WBC 7 – LIGHT POLLUTION a) Development should mitigate through design minimising night blight by using lower lumen lighting suitably positioned in a downwards direction and avoiding reflections onto surfaces.	**POLICY WBC 6 – LIGHT POLLUTION** a) Insofar as planning consent is required, developments should mitigate through design, minimising night blight by using lower lumen lighting suitably positioned in a downwards direction and avoiding reflections onto surfaces.	Ref 49-59

b) New commercial and external light signage will only be permitted with justification for operational, safety or security reasons, designing in such a way to minimise spillage beyond the application site using guidance on lighting by the Institute of Lighting professionals (ILP) GN01, the reduction of obstructive light.	b)New commercial and external light signage will only be permitted with justification for operational, safety or security reasons, designing in such a way to minimise spillage beyond the application site using guidance on lighting by the Institute of Lighting Professionals (ILP) GN01, the reduction of obtrusive light.	
POLICY WBC8 – NOISE POLLUTION ~~a) Support will be given for measures that reduce town centre vehicle noise especially at night through encouragement to use peripheral roads.~~ b) Developments will be encouraged at the design stage to consider better noise insulation with features such as trees and hedges in landscaping, and wall insulation.	**POLICY WBC 7 – NOISE POLLUTION** Developments will be encouraged at the design stage to consider measures that reduce vehicle noise and noise insulation with features such as trees and hedges in landscaping, and wall insulation.	Ref 49-59

APPENDIX A - Initial Questionnaire Engagement March 2020

Table 3 – Views Captured by Theme

Environment and Climate Change

Environment and Climate Change	Value	Difference(s) by subgroup	Quote/ other suggestions
Environment and Climate Change	The abundance of open and green spaces and the beautiful parks.	Across all age groups	"The closeness of the Abby Grounds within the town and Cirencester Park literally brings the countryside right into the town".
"	Cultural heritage and historic centre	Overwhelmingly cited by 30 – 64 and 65+	"Own identity"
"	The history of the town	65+	"Beautiful market town steeped in History".
"	Cirencester is a rural town in a beautiful setting	Across all age groups	
"	Unspoilt traditional market town	Overwhelmingly 65+	"Quaintness".
"	The proliferation of trees and nature	Across all age groups	Could be combined with the open and green spaces but specifically mentioned
"	Clean with limited pollution	30 – 64 and 65+	

Environment and Climate Change	Concern	Difference(s) by subgroup	Quote/ other suggestions
Environment and Climate Change	Building on open green spaces	All age groups	

"	Flood resilience, water management and drain maintenance	30 – 64 and 65+	
"	Pollution	All age groups	C02 emissions; plastic; littering
"	Climate change and general environmental degradation	All age groups	As above
"	Cleanliness due to dog excrement and vandalism	All age groups	
"	Devaluing of historic buildings	65+	But see Development, Design and Built Environment
"	Corona virus	All age groups	Cited a couple of times but clear implications economically and socially

Environment, Climate Change, Heritage	Change	Difference(s) by subgroup	Quote/ other suggestions
Environment, Climate Change, Heritage	The protection and enhancement of green spaces including the planting of more trees	All age groups	
"	Tackling Climate Change effectively – reducing pollution, single use plastic, and carbon emission	All age groups	"A genuine engagement with the climate emergency".
"	Preserve and protect the town's heritage	30-64 and 65+	"It must keep its character, preserving its history but having good modern facilities for young and old".
"	More action on flood prevention, drain management and dredging	30-64 and 55+	Almost 70% of respondents thought this issue is at least important to prevent future flooding that has occurred previously in the town"
"	Increased focus on litter picking, removal of graffiti and street cleaning	All age groups	

“	The improvement of verges and roundabouts including maintenance, more planting of wild flowers and establishing wildlife corridors	All age groups	

Access, Infrastructure and Transport

Access, Infrastructure and Transport	Value	Difference(s) by subgroup	Quote/ other suggestions
Access, Infrastructure and Transport	Connectivity to other larger towns and cities	Across all age groups	
“	Proximity to major road networks (A417/M4/M5	Across all age groups	
“	Ease of accessing the town centre by foot	Across all age groups	
“	Transport links (bus and rail)	16-29 and 65+	51 bus and coach service to London mentioned
“	Convenient access to the town centre	30–64 and 65+	
“	Pedestrianised town centre that is relatively flat	Across all age groups	

Access, Infrastructure and Transport	Concern	Difference(s) by subgroup	Quote/ other suggestions
Access, Infrastructure and Parking	The town infrastructure being unable to cope with continuous growth	All age groups	Linked to this are the maintenance and upgrades of drains and waste management

“	Parking including availability, ease of access, cost and lack of disabled and short-term parking	All age groups	
“	Traffic and road congestion	All age groups	
“	Transport links and connectivity to other towns/cities including services, routes and frequency.	All age groups	
“	Road maintenance – disrepair, potholes and poorly maintained pavements	All age groups	
“	Lack of a network of cycle paths	All age groups	*Deemed as very important in the closed question on this in the survey*

Access, Infrastructure and Transport	Change	Difference(s) by subgroup	Quote/ other suggestions
Access, Infrastructure and Transport	Light rail/rail links to Kemble and Swindon	All age groups	
“	Devise and implement innovative strategies to tackle the parking issues for both residents and visitors	All age groups	Out of town car park “multi-storey car park needs to be built like a carbuncle, in the town centre”; Park and Ride; increased residents’ parking; permit parking for those working in Cirencester; more short-term parking capacity.
“	Establish more cycle paths and routes in and around town.	All age groups	“Connectivity and quantity of cycle paths improved”; “Safe segregated cycle paths everywhere”.
“	More of the town centre to be pedestrianised to create better walking routes and reduce traffic and associated pollution and congestion.	All age groups	“Better infrastructure that allows traffic to flow easily without heading through town”

“	Improved public transport links including the creation of a transport hub in town	All age groups	Calls for improved links to Cheltenham, Gloucester, Swindon by bus.
“	Change the traffic systems in town to make them clearer particularly for visitors.	30 – 64 and 65+	Cricklade Street; Castle Street and the Market Place were all mentioned.
“	Implement a programme to sustain the maintenance of roads and pavements	All age groups	Resurfacing roads get rid of potholes effectively

Development, Design and the Built Environment

Development, Design and the Built Environment	Value	Difference(s) by subgroup	Quote/ other suggestions
Development, Design and the Built environment	The array and plethora of the varying architecture within the town	This was the predominant ‘like’ across all age groups for this theme	
“	Beautiful individual town centre	30 – 64 and 65+	
“	Ideal size (small)	30 – 64 and 65+	
“	Market Place improvements including the Parish Church	65+	

Development, Design and the Built Environment	Concern	Difference(s) by subgroup	Quote/ other suggestions
Development, Design and the Built Environment	Expansion and overdevelopment of housing and its impact on the town – the proposed Chesterton development was cited numerous times	All age groups	"Need continued growth in the right way".
"	Lack of controlled and strategic planning for future development and expansion	30 – 64 and 65+	"That it will remain stuck in the past and fail to integrate innovative modern solutions to some of the challenges it faces".
"	Lack of affordable housing	All age groups	
"	Loss of charm, character and individuality within the town	65+	The plans for the 'eye sore' multi storey car park by Waterloo
"	Poor maintenance and neglect of buildings	All age groups	Cricklade Street; "tatty town centre" and "down market".
"	Modern additions not in keeping with the existing town aestheticism	65+	

Development, Design and the Built Environment	Change	Difference(s) by subgroup	Quote/ other suggestions
Development, Design and the Built Environment	More controlled planning of housing development to ensure more affordable and social housing is available	30 – 64 and 65+	Important for the continuity of the community
"	More controlled planning with a vision for the future to ensure the town's infrastructure can accommodate growth simultaneously whilst keeping the architectural beauty of the town	30 – 64 and 65+	This is also a major concern with all age groups

"	Carry through proposed developments to completion in a timely fashion	30 – 64 and 65+	The development of the area around Brewery Arts
Development, Design and the Built Environment	Remove and/or upgrade buildings that are an eyesore to make the town more attractive to inhabitants and visitors alike	All age groups	House of Fraser; Buildings in Cricklade Street; Magistrates Court; Police station
"	Continue to enhance the Market Place	30 – 64 and 65+	Pedestrianised fully; return to original design; change the kerbs; introduce more seating
"	Conduct more feasibility studies on potential areas for development	30 – 64	Development of the Amphitheatre area

Economy, Business and Retail

Economy, Business and Retail	Value	Difference(s) by subgroup	Quote/ other suggestions
Economy, Business and Retail	The variety of shopping generally	All age groups	"Breadth of shopping".
"	Thriving and compact town centre that encourages visitors	All age groups	The Market Place was mentioned several times as were the actual markets
"	The array of independent and individual shops	30 – 64 and 65+	
"	The range of amenities – restaurants, bars, coffee shops and hotels	30– 64 and 65+	
"	Range of supermarkets	Predominantly 30-64 but a few 65+	

Economy, Business and Retail	Concern	Difference(s) by subgroup	Quote/ other suggestions
Economy, Business and Retail	Town centre dying due to closure of a number of shops	All age groups	There were calls for more clothing and electrical shops meeting all needs, but particularly for the young and elderly. “The health of the retail offer”.
“	Lack of business support and encouragement resulting in the loss of independent shops.	All age groups	“The high street is struggling to maintain the diversity of retail outlets”.
“	The impact of on-line shopping and the resulting decline in the occupation of retail space	All age groups	“The closed House of Fraser is already quite a blot on the Market Place”.
“	The impact of high business rents and rates slowing economic growth due to retail closures	All age groups	
“	The loss of visitor and tourist appeal and the impact on the local economy across all sectors.	All age groups	“Attracting visitors to the town and making it a desirable place to make a day visit to”
“	Declining employment opportunities for professionals and young people.	All age groups	

Economy, Business and Retail	Change	Difference(s) by subgroup	Quote/ other suggestions
Economy, Business and Retail	Endeavour to attract a range of retail outlets that will meet the needs of all age groups.	All age groups	“The health of the retail offer”.
	Offer more support to local businesses to prevent the closure of shops and to attract new business ventures through the reduction of rents and rates	All age groups	“The high street is dying”.

	Promote tourism to attract more visitors to the town to boost the local economy and provide employment opportunities	All age groups	
	Explore further initiatives and events that will help the town centre to retain its retail and hospitality vibrancy	All age groups	Different cuisines; improved farmers' and indoors

Community, Culture and Leisure

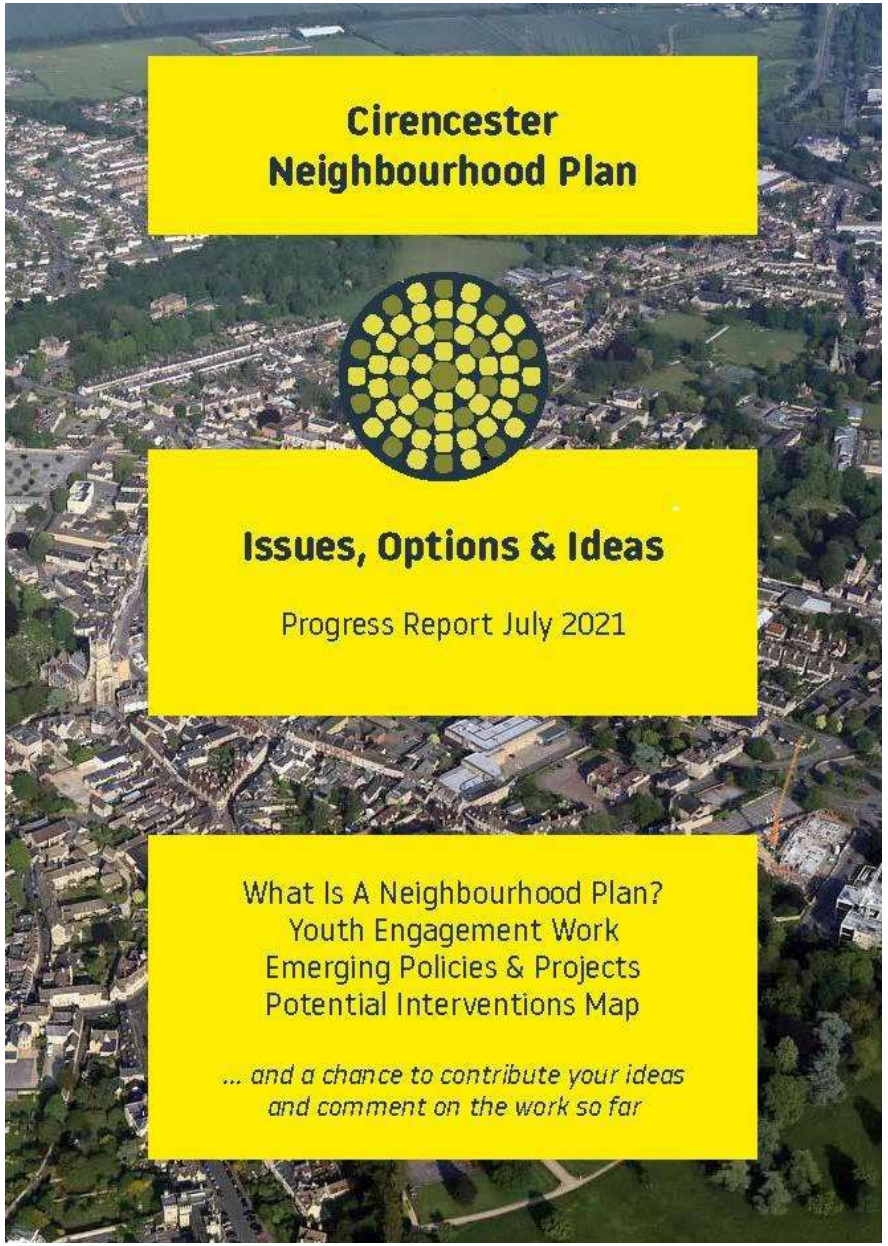
Community, Culture and Leisure	Value	Difference(s) by subgroup	Quote/ other suggestions
Community, Culture and Leisure	The sense of a real community spirit	All age groups – this was by far the most valued	
"	Friendly people	All age groups	
"	Education and the number of varying institutes (schools, colleges and university)	All age groups	
"	Range of community organisations and clubs	All age groups	Next Door App mentioned
"	Leisure and entertainment;	All age groups	Outdoor pool; leisure centre; sport facilities; parks; events (Phoenix); choice of eating places; all adding to the quality of life.
"	Other social venues	All age groups	Barn Theatre; Library; Museum
"	Key services – Hospital; Doctors; Dentists	30 – 64 and 65+	
"	Safety and low crime	30 – 64 and 65+	"Lovely laidback safe feeling".

Community, Culture and Leisure	Concern	Difference(s) by subgroup	Quote/ other suggestions
Community, Culture and Leisure	The impact and strain on key services and amenities as a result of continuous growth and the increasing population.	All age groups	Includes health, education, housing, police, fire and other social services.
"	Reduction in public services particularly with regards to the various hospital departments	All age groups but particularly 30 – 64 and 65+	Proposed closure and restrictions of some hospital departments and services
"	Loss of community spirit due to overdevelopment	All age groups	"Dilution of the community". Ageing population, social isolation and increasing deprivation for the more vulnerable.
"	Lack of recreation and leisure facilities	All age groups	See desired changes numerous calls for a cinema from all age groups
"	Impact of insufficient youth provision leading to the younger generation going elsewhere to live leaving an elderly and ageing population	All age groups	Lack of opportunity to contribute to the community
"	Impact of insufficient youth provision potentially increasing crime and delinquency	All age groups	Drugs and gangs were mentioned by 16-29 group

Community, Culture and Leisure	Change	Difference(s) by subgroup	Quote/ other suggestions
Community, Culture and Leisure	The opening of a cinema	All age groups	This was by far the most frequent request from across respondents
"	Improve the services and provision for young people	All age groups	Retain the youth population within the town; prevent anti-social behaviour

"	Improve the local health service	30 – 64 and 65+	Reinstate local hospital services to reduce the need to travel; an in-town drop-in health centre; medical centres in the Beeches and Stratton
"	Initiate more community activities and entertainment for all ages	All age groups	Festivals; outdoor cinema; bowling; mini golf
"	Provide more support for the homeless and the vulnerable	30-64 and 65+	
"	Provide more recreation facilities for the younger generation	30 – 64 and 65+	Just under 75% of respondents thought the provision of recreational space was at least important; help to keep children safe

APPENDIX B – Progress Report resulting from March 2020 and Spring 2021 Engagements



What Is The Cirencester Neighbourhood Plan?

Cirencester Town Council is supporting the preparation of the Cirencester Neighbourhood Plan, being prepared by the local community, the people who know and love Cirencester best. This will ensure that Cirencester gets the right development in the right place. When complete, the Cirencester Neighbourhood Plan will be used to influence and to decide planning applications, including new buildings and changes to existing buildings and the use of land across the whole town.

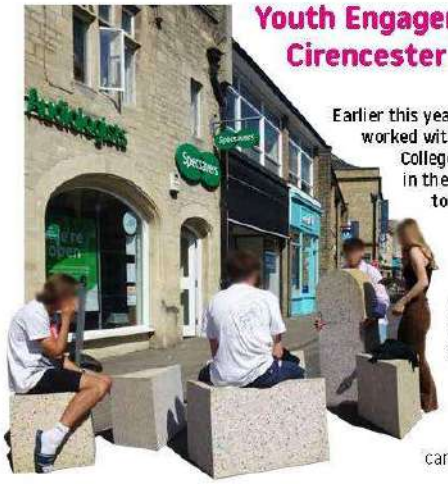
The neighbourhood plan is being prepared by Steering Group of local people on behalf of the Cirencester Town Council. This report sets out progress so far and the ideas, issues and options discussed by the Steering Group. Cirencester has a rich history and a bright future. The Steering Group would like to hear from you and to get your thoughts on that future. You can do this by providing your own ideas and by commenting on those set out in this report.

Neighbourhood planning is a powerful tool that gives communities statutory powers to shape how their communities develop. The Cirencester Neighbourhood Plan will be a document that sets out planning policies for the whole of the town, consisting of the eight election ward boundaries of Abbey, Beeches, Chesterton, Four Acres, New Mills, St Michael's, Stratton and Watermoor.

Time Line	Plan Preparation Actions
March 2020	Early community engagement via a questionnaire survey
rest of 2020	Thematic Groups develop specific policy and project ideas
Spring 2021	Digital focus groups held on Zoom to test ideas further
April to June 2021	Youth engagement with college and local schools
July 2021	Preparation of this Progress Report
Summer 2021	Consultation on this Progress Report
Estimated Forward Time Line	
Autumn 2021	Refine policy and project ideas based on feedback received
Winter 2021	Further public consultation and engagement work
Spring 2022	Formal 6-week (minimum) consultation of full draft of the plan
Spring 2022	Revisions and changes based on consultation results
Summer 2022	Submission of revised plan to Cotswold District Council
Late 2022	Independent examination
Spring 2023	Referendum (plan obtains legal force if supported at referendum)

For more information on progress to date, please go to www.cirencesternp.org

Youth Engagement with Cirencester College



Earlier this year, the neighbourhood plan team worked with young adults from Cirencester College, who shared their experiences of life in the town and the things they would like to improve in the future.

With the support of the geography staff, the college students participated in a design workshop in Cricklade Street, using foam blocks light enough to move but strong enough to sit on. These blocks sparked illuminating conversations with the public about how the town can be better designed as a place to stay rather than a place to shop and how it can be more welcoming to young people.







What the college students said ...

"We come to town to meet up, to go to a café"

"We often meet in Abbey Grounds as it is a more open space"

"It would be good if there were fewer cars in town"

"We like Black Jack Street because there are lots of independent shops, there is lots to look at and it feels like you are in another country"

"Black Jack Street is nice because there are plants outside the shops, it looks more welcoming than Cricklade Street"

"Abbey Gardens could have more events, such as five-a-side football"

"There needs to be more public space – the area behind Cricklade Street – there is loads of space here but it is badly designed, this could be a great social space with a market"

"There are no public toilets in the park or town centre and there really needs to be otherwise you have to go into a café"

"We really like the area outside the Abbey with the coffee vans and informal seating"

"The skate park is far away from town. It's like we don't belong in town. If the skate park was closer to town we would use the shops and cafés"

To see more results and to add your own ideas to the mix, please go to www.cirencesternp.org

Youth Engagement with Local Schools

Meanwhile, the neighbourhood plan team have asked children at several local schools — Chesterton, Watermoor, Stratton, Paternoster and Powell's — for their ideas. These younger children from across Cirencester have been creatively designing playful new spaces. Using a bespoke worksheet distributed through the schools, they were asked a series of questions and invited to draw ideas for the future. Below is a summary of the main messages received.

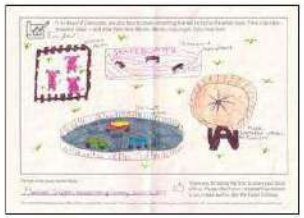
Q. Talk to each other about your journey to school. Please write down three things that would improve your journey.

Number of responses from the total of 97 received that included these types of details...

... and the top three suggestions within that category of response

1	**Modes of Transport**	**65**
	More Cycle Paths or Routes	16
	Less Traffic & Fewer Cars	14
	More Cycling	8
2	**Maintenance**	**52**
	Less Dog Mess	16
	Cleaner, Less Litter	13
	Fewer Potholes	10
3	**Improving Streets & Paths**	**42**
	Lower Speed Limits, Less Speeding	7
	Wider Walking Paths	7
	More or Different Routes	6







Here are just a few examples of the 97 schools worksheets returned to the project team. Careful analysis of all the drawings provided an insight to the types of changes this age group would like to see.

To see more results and to add your own ideas to the mix, please go to www.cirencesternp.org

Q: Imagine you have a friend from far away coming to visit. They want to see Cirencester. Where would you take them and why?



1	**Pretty Outdoor Places**	**69**
	Abbey Grounds	18
	Parks	17
	Cirencester Park	15



2	**Urban & Civic Places**	**48**
	Museum	8
	Shops	6
	Town Centre	5



3	**Adventure Activities & Sports**	**29**
	The Outdoor Pool	9
	Other Swimming Pools	5
	Leisure Centres	3

Q. You are Mayor of Cirencester! Please create something that will be fun for the whole town. Think of an idea — or several ideas!



1	**Sports & Adventure Activities**	**52**
	Trampoline Park	10
	Water Park	10
	Skate Park	8



2	**Entertainment & Things To Do**	**52**
	Cinema	11
	Fun Fair	7
	Theme Park	5



3	**Playground Equipment**	**50**
	Slides	10
	Swings	10
	More Playgrounds	6

Draft Vision, Aims & Objectives

DRAFT VISION **The Cirencester Neighbourhood Plan needs a Vision Statement at the beginning, to help set the scene. Neighbourhood plan vision statements can be a single sentence or a few paragraphs, setting out in words the type of place the town and surroundings should be like in the future.** What sort of place will Cirencester be to live, work and visit? What sort of qualities and characteristics it should exhibit? This is the draft Vision Statement (right) developed by the Steering Group and based on all the research undertaken to date. What do you think? Do you agree?

"From Roman origins to a bright zero carbon future, Cirencester — the capital of the Cotswolds — will be a place that responds fully to the climate emergency, where we can celebrate the town's rich history and attractive appearance; where we can enjoy spending time, both in the urban streets and spaces and in the green open spaces and nature reserves; where workers, residents and visitors want to be; where developments integrate the needs of people and nature; and where there is a distinctive character and identity, rooted in traditional town centre uses, all enriched by new businesses and sustainable economic activity"

To comment on the draft Vision, Aims & Objectives, please go to www.cirencesternp.org and complete the survey

DRAFT AIMS & OBJECTIVES **What do the planning policies and projects in the plan seek to achieve? How do they work together?** The aims and objectives should be concise statements setting out what protections and enhancements to Cirencester will be brought about by the plan. These are important as they will become benchmarks against which the effectiveness of the plan will be assessed post-referendum. Below is a set of draft aims and objectives. What do you think?

1. *Maintain and enhance the distinctive Cotswold visual character of Cirencester, its immediate setting, and the wider neighbourhood area.*
2. *Coordinate all new development so that it contributes to the "20 Minute Neighbourhood Model" including the creation of safe, sustainable, liveable and mixed communities with good access to jobs and essential services for the whole community.*
3. *Create a robust yet flexible network of streets and spaces to effectively promote active travel modes, for both current and future populations.*
4. *More effectively integrate the outlying residential areas with the town centre core, overcoming the barrier effect of highways infrastructure as currently experienced.*
5. *Reduce demand for energy, improve air quality, mitigate flood risk and achieve net zero carbon.*
6. *Protect and enhance the natural and historic environment, the quality and character of the built environment and the wider countryside.*
7. *Raise the quality of new development through use of sustainable materials, methods, details, and inclusive design that responds to the Cirencester context.*
8. *Ensure that land made available for development will be developed in an efficient manner, in such a way as to improve people's quality of life, for both new and existing residents.*
9. *Manage the threat of flood by safeguarding functional floodplain and ensuring that such measures necessary to protect the area are undertaken.*
10. *Deliver the community infrastructure necessary to support an evolving town into the future.*

Emerging Planning Policies

The main part of a neighbourhood plan is a series of planning policies that will be used to determine future planning applications e.g. should a development proposal be granted planning permission or not? The planning policies will be used to help make these decisions. The draft planning policies in this report have been developed by the Steering Group and are grouped into six different themes or topic areas. At the present time, the draft policies are only short one-liners. The final policy statements will be more comprehensive.

What do you think? Do you agree? Are there issues important to you that you feel are missing from this set of draft planning policies?

Access & Movement

* active travel means walking and cycling

1. *Improve active travel* routes that connect outlying residential areas (e.g. Stratton, the Beeches etc) with the town centre core.*
2. *Establish better active travel links between the town and the surrounding countryside e.g. Water Park, Kemble etc.*
3. *Through a range of coordinated measures — including street design, town centre management, signage, and a vehicle parking strategy — seek to reduce the number of vehicle movements within the town centre.*
4. *Support for the development of a single public transport hub, that will allow convenient and easy access to bus services, car clubs and taxi ranks.*
5. *Backing for measures that make walking and cycling more convenient across Cirencester.*

Design & Built Environment

6. *New development and their designs to respond positively to the Cotswold vernacular and the distinctive Cirencester context.*
7. *New developments to be sited in ways that protect and enhance identified views and vistas e.g. of church towers.*
8. *Promotion of locally affordable new homes in the most sustainable locations.*
9. *Encourage the conversion of upper floors across the town centre to residential uses to support a larger population living in the centre.*
10. *All development proposals required demonstrate how they will contribute to the "20 Minute Neighbourhood Model" — see Interventions map for details.*

Quality of the Public Realm

11. *Support for proposals that enhance the quality of streets and spaces, such as better surface materials, more generous space for pedestrians and improved lighting.*
12. *Proposals that make Cirencester more walkable and more sociable, that identify and enhance spaces for social encounters — "bumping spaces" — will be supported by the plan.*
13. *Through the submitted Design & Access Statements (DASs) planning applications will be expected to demonstrate how they can enhance the town's streets and spaces and how they respond to relevant street design guidance.*
14. *Protect identified and mapped Non-designated Heritage Assets.*
15. *Support for a heritage trail, new wayfinding systems and quality signage.*

Emerging Planning Policies /... continued

Economy

16. *Proposals that offer to introduce the missing elements of the "20 Minute Neighbourhood Model" to the town will be supported.*
17. *Proposals that will erode the critical mass of town centre economic activity will be resisted. This includes proposals that will convert employment, leisure, food/drink, commercial or social spaces to residential uses.*
18. *New models of town centre economic activity, such as hybrid spaces — cafe, workshop, performance, health, education, co-working, social and/or community spaces — will be supported.*
19. *Protection of ground floors within the town centre core from conversion to residential. This will safeguard street level spaces for retail, social, community and entrepreneurial activity that will maintain a vibrant and lively town centre atmosphere.*
20. *Protect, enhance existing employment areas (e.g. Love Lane Industrial Area) allowing flexible growth through the sensitive introduction of new economic uses and activities. Seek the repurposing of out of town retail "sheds" to alternative commerical or social use as retail demand declines.*

Environment & Climate Change

21. *Support for proposals that move the town towards net zero carbon and mitigate the effects of climate change.*
22. *Identify and protect Local Green Spaces (LGS) as designated by the plan. These are spaces that are local in character, in reasonably close proximity to the community and hold a particular local significance, for example because of their beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.*
23. *Protect and enhance land identified as important for biodiversity, wildlife habitats and/or wildlife corridors, river corridors and wetlands.*
24. *Protect the functional floodplain from development, with the exception of essential infrastructure works required by flood mitigation.*
25. *Development proposals to accord with approved sustainable ultra-low carbon construction methods and "Building With Nature" techniques.*
26. *Measures that improve air quality across the plan area, especially in the town centre, will be supported.*

Wellbeing & Community

27. *Health Impact Assessments (HIA) will be required to support certain types of planning applications (criteria to be determined) with a key issue for HIAs to address being the cycling and walking characteristics of each new developments and how they collectively contribute to the connectivity of the whole town.*
28. *Protect and enhance access to open spaces — especially those that are green, open and accessible for recreation, sport and play — in order to support physical, social and mental wellbeing.*
29. *Support a network of appropriate play spaces for all ages.*
30. *The plan will promote new town centre cultural and leisure activity and destinations.*
31. *Require new development to limit light and noise pollution to enhance the ambience of the town and maintain dark skies at night.*

To comment on the draft Planning Policies, please go to www.cirencesternp.org and complete the survey

Draft Plan Projects List

Neighbourhood plan projects are the capital works (e.g. a new community centre, a new stretch of footpath, investment in children's play area) or management initiatives (e.g. a town centre manager, a tourism strategy, a new community group that can collaborate and raise funds) that will ultimately be how some or all of the planning policies will be implemented

Here is a list of draft projects for inclusion in the Cirencester Neighbourhood Plan. What do you think? Do you agree? Are there projects that you feel are missing from this set of projects?

1. *Introduce flood alleviations schemes at various locations across the town, as appropriate*
2. *Establish a series of connected cycle paths around the edge of town ("the wheel") that connect to routes into the town centre ("the spokes")*
3. *Establish longer distance cycle paths as follows: from Cirencester to Kemble; from Cirencester to South Cerney; and from Siddington to Stratton (improving the current inadequate shared space along the Gloucester Road)*
4. *A project to encourage the opening up of school buildings and grounds for community and public use during holidays, weekends and evenings*
5. *Ensure future technological requirements for vehicle fuel systems and energy sources are provided across the whole town e.g. Public electric vehicle charging points, hydrogen delivery pumps etc*
6. *Funding for regular, all-week (including late evening) public transport connections to key regional centres (e.g. Cheltenham), rail interchanges, hospitals and local destinations (e.g. Fairford and Tetbury)*
7. *Establish a Business Improvement District (BID) for the town centre*
8. *Establish a Town Centre Manager*
9. *Create a Cirencester Tourism Strategy, separate but linked to Cotswold-wide strategy*
10. *Establish better links with regional/ Gloucestershire business and skills bodies and exploit Cirencester's education cluster reputation to attract new businesses*
11. *Reconnect the Roman amphitheatre to the town centre, working with AQIVA and GCC Highways to identify a new connection location, funding and type, to be supported by brown heritage signage and maintenance*
12. *Project to identify methods and locations for new physical connections – including footpaths, cycleways, bridges, light-controlled crossings – to better link outlying residential areas with the town centre*
13. *Identify existing playgrounds in need of funding and/or maintenance and gaps in provision where new play spaces should be provided*
14. *Identify an alternative site and an operator for a new cinema project, to be part of a venue that can also support live music*
15. *Increase the number of neighbourhood assets (e.g. community spaces, play areas etc) in The Beeches, Outer Watermoor and Chesterton*
16. *Create a walking map for Cirencester, that identifies small spaces for social encounters, together with green and pleasant routes to link where people live with the town centre.*
17. *Audit mapping of all sports and recreational facilities to ensure the type, distribution, and quantity is appropriate for a growing population*
18. *Audit mapping of social and recreational spaces to ensure all spaces are inclusive of gender, age and disability*
19. *Audit mapping of all town views and vistas*

To comment on the draft Plan Projects, please go to www.circencesternp.org and complete the survey

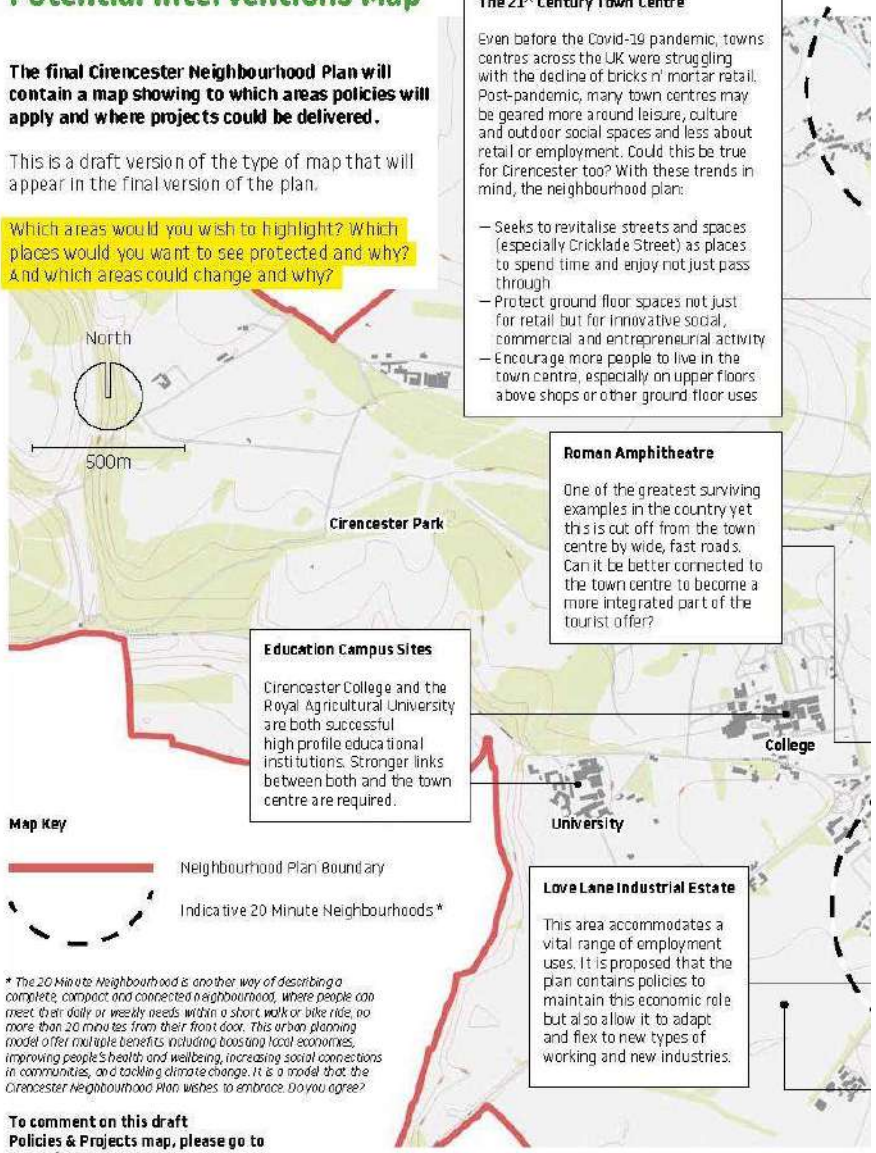
9

Potential Interventions Map

The final Cirencester Neighbourhood Plan will contain a map showing to which areas policies will apply and where projects could be delivered.

This is a draft version of the type of map that will appear in the final version of the plan.

Which areas would you wish to highlight? Which places would you want to see protected and why? And which areas could change and why?



The 21st Century Town Centre

Even before the Covid-19 pandemic, towns centres across the UK were struggling with the decline of bricks n' mortar retail. Post-pandemic, many town centres may be geared more around leisure, culture and outdoor social spaces and less about retail or employment. Could this be true for Cirencester too? With these trends in mind, the neighbourhood plan:

- Seeks to revitalise streets and spaces (especially Cricklade Street) as places to spend time and enjoy not just pass through
- Protect ground floor spaces not just for retail but for innovative social, commercial and entrepreneurial activity
- Encourage more people to live in the town centre, especially on upper floors above shops or other ground floor uses

Roman Amphitheatre

One of the greatest surviving examples in the country yet this is cut off from the town centre by wide, fast roads. Can it be better connected to the town centre to become a more integrated part of the tourist offer?

Education Campus Sites

Cirencester College and the Royal Agricultural University are both successful high profile educational institutions. Stronger links between both and the town centre are required.

Love Lane Industrial Estate

This area accommodates a vital range of employment uses. It is proposed that the plan contains policies to maintain this economic role but also allow it to adapt and flex to new types of working and new industries.

** The 20 Minute Neighbourhood is another way of describing a complete, compact and connected neighbourhood, where people can meet their daily or weekly needs within a short walk or bike ride, no more than 20 minutes from their front door. This urban planning model offer multiple benefits including boosting local economies, improving people's health and wellbeing, increasing social connections in communities, and tackling climate change. It is a model that the Cirencester Neighbourhood Plan wishes to embrace. Do you agree?*

To comment on this draft Policies & Projects map, please go to www.circencesternp.org and complete the survey

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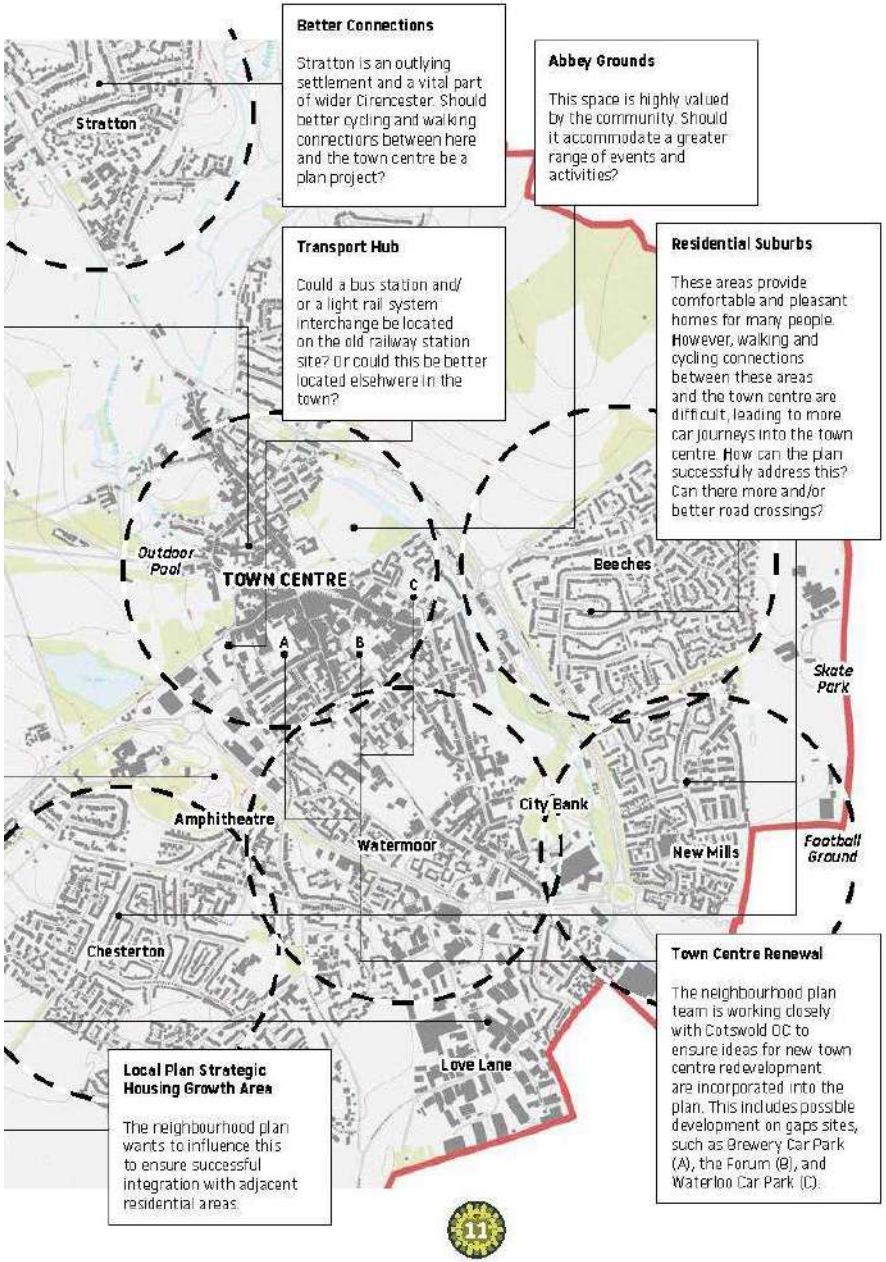
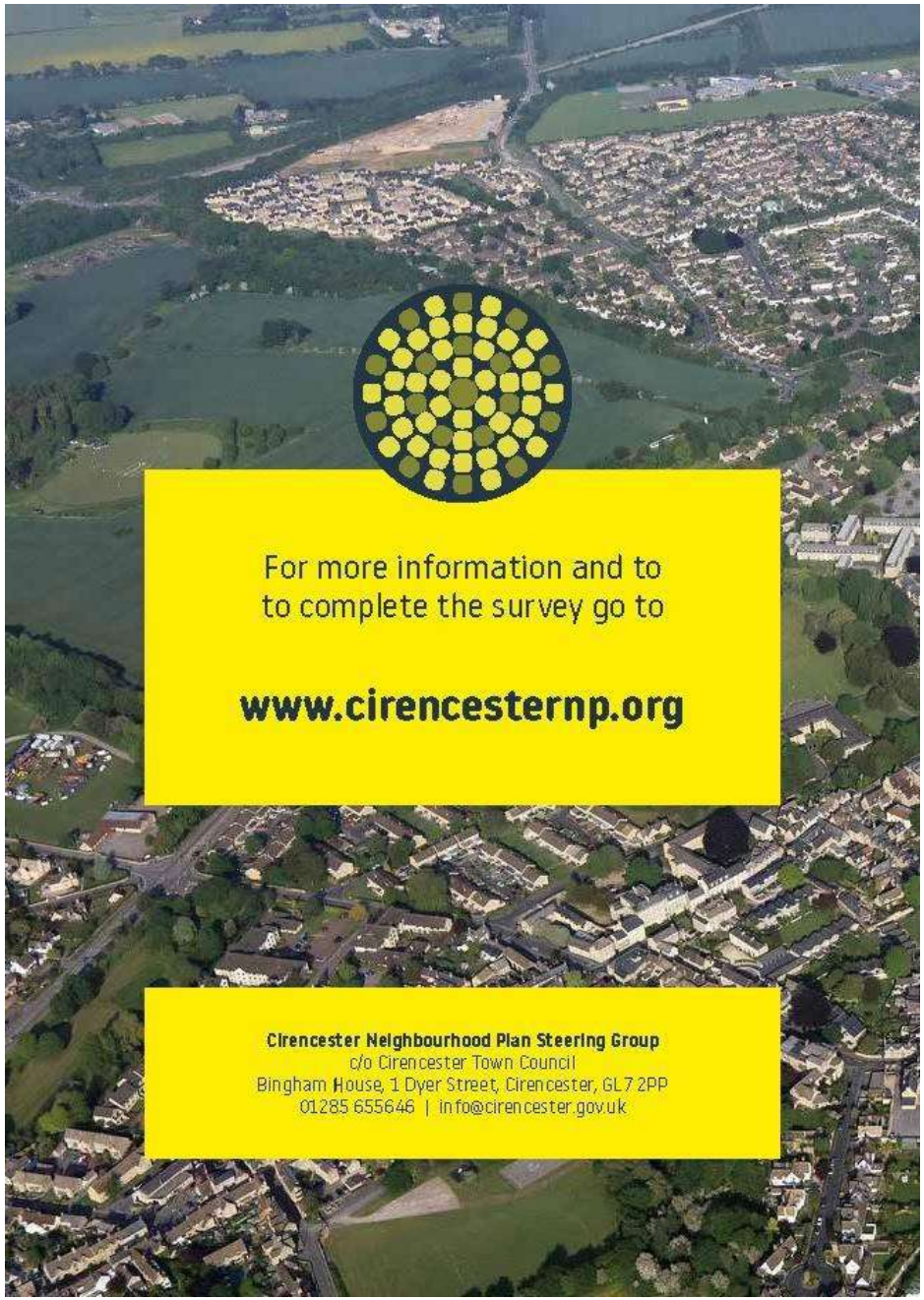

Better Connections
Stratton is an outlying settlement and a vital part of wider Cirencester. Should better cycling and walking connections between here and the town centre be a plan project?
Abbey Grounds
This space is highly valued by the community. Should it accommodate a greater range of events and activities?
Transport Hub
Could a bus station and/or a light rail system interchange be located on the old railway station site? Or could this be better located elsehwere in the town?
Residential Suburbs
These areas provide comfortable and pleasant homes for many people. However, walking and cycling connections between these areas and the town centre are difficult, leading to more car journeys into the town centre. How can the plan successfully address this? Can there more and/or better road crossings?
Stratton
Outdoor Pool
TOWN CENTRE
A
B
C
Beeches
Skate Park
Amphitheatre
Watermoor
City Bank
New Mills
Football Ground
Chesterton
Love Lane
Local Plan Strategic Housing Growth Area
The neighbourhood plan wants to influence this to ensure successful integration with adjacent residential areas.
Town Centre Renewal
The neighbourhood plan team is working closely with Cotswold DC to ensure ideas for new town centre redevelopment are incorporated into the plan. This includes possible development on gaps sites, such as Brewery Car Park (A), the Forum (B), and Waterloo Car Park (C).
11


For more information and to to complete the survey go to
www.cirencesternp.org
Cirencester Neighbourhood Plan Steering Group
c/o Cirencester Town Council
Bingham House, 1 Dyer Street, Cirencester, GL7 2PP
01285 655646 | info@cirencester.gov.uk

APPENDIX C – Summer 2021 Progress Report Engagement – Results

Question A. Do you agree with the draft Vision Statement?

- Yes (22 Participants - 67%)
- No (5 Participants - 15%)
- Don't Know (6 Participants - 18%)

Question B. Age Profile

- 26 - 35 (3 Participants – 9%)
- 36 - 45 (2 Participants – 6%)
- 46 - 55 (7 Participants – 22%)
- 56 - 65 (5 Participants – 16%)
- 66 - 75 (10 Participants – 31%)
- 75 + (4 Participants – 13%)

Question C. What would you change about the draft Vision Statement?

- The Vision Statement should be less focussed on the climate crisis. Yes, mention it but put local community interests at its heart, for example Cirencester's award winning parks.
- There should be more focus on building strong residential communities.
- The Vision statement is too long winded, unwieldy, and unfocussed and it therefore does not really become clear what difference it would make to the town.
- Improve the poor cultural and creative opportunities. Do not restrict the Vision Statement to "traditional town centre uses" but be open to progress and include leisure and entertainment.
- Support small local rural businesses and weed out cafes and beauty parlours.
- Green spaces and nature reserves need to be biodiverse; lawns are diversity dead zones.
- Prioritise the 20 Minute Neighbourhood.
- Create better looking and functioning toilets.
- Include a car free and no parking market place to create an attractive space that will attract all sorts of activity.
- Emphasise the control of development more.

Question D. Aims and Objectives Top 3 – The following aims were the most popular when ranking:

- Protect and enhance the natural and historic environment, the quality and character of the built environment and the wider countryside.
- Coordinate all new development so that it contributes to the "20 Minute Neighbourhood Model" including the creation of safe, sustainable, liveable, and mixed

- communities with good access to jobs and essential services for the whole community.
- Create a robust yet flexible network of streets and spaces to effectively promote active travel modes, for both current and future populations.
- Reduce demand for energy, improve air quality, mitigate flood risk, and achieve net zero carbon.
- More effectively integrate the outlying residential areas with the town centre core, overcoming the barrier effect of highways infrastructure as currently experienced.
- Maintain and enhance the distinctive Cotswold visual character of Cirencester, its immediate setting, and the wider neighbourhood area.
- Deliver the community infrastructure necessary to support an evolving town into the future.
- Manage the threat of flood by safeguarding functional floodplain and ensuring that such measures necessary to protect the area are undertaken.

Question E. Which Emerging Planning Policies are most important to you? Top 5 - The following aims were the most popular when ranking:

- Improve active travel routes that connect outlying residential areas (e.g. Stratton, the Beeches etc) with the town centre core.
- Protect and enhance access to open spaces — especially those that are green, open and accessible for recreation, sport and play — in order to support physical, social and mental wellbeing.
- Establish better active travel links between the town and the surrounding countryside e.g. Water Park, Kemble etc.
- Through a range of coordinated measures — including street design, town centre management, signage, and a vehicle parking strategy — seek to reduce the number of vehicle movements within the town centre.
- Support for proposals that move the town towards net zero carbon and mitigate the effects of climate change.

Question F. Which of the 19 draft Planning Projects are most important to you? Top 5 - The following aims were the most popular when ranking:

- Funding for regular, all-week (including late evening) public transport connections to key regional centres (e.g. Cheltenham), rail interchanges, hospitals and local destinations (e.g. Fairford and Tetbury)
- Project to identify methods and locations for new physical connections — including footpaths, cycleways, bridges, light-controlled crossings — to better link outlying residential areas with the town centre
- Establish a series of connected cycle paths around the edge of town (“the wheel”) that connect to routes into the town centre (“the spokes”)
- Establish longer distance cycle paths as follows: from Cirencester to Kemble; from Cirencester to South Cerney; and from Siddington to Stratton (improving the current inadequate shared space along the Gloucester Road)
- Introduce flood alleviations schemes at various locations across the town, as appropriate

APPENDIX D – Regulation 14 Consultation Responses

Table 3 - Responses from Statutory Consultees and Other Organisations

REG 14 COMMENTS RECEIVED FROM ORGANISATIONS INCLUDING STATUTORY CONSULTEES			
Ref.	Name	Summary of Comments Received	Response from the Qualifying Body
	Cotswold District Council	**05 TOWN CENTRE**	
1		**Pg 27** General Principles supported but note they are subject to 'planning balance'	Noted - no change necessary current main body text and policies adequate
2		**Pg 26 PARA 5.8** Refer to 'Integrated Mobility Hub' or similar e.g. 'The Hub' throughout doc instead of IMH, to improve accessibility. Reference to IMH preferred site being unknown is not wholly accurate - suggest share indications provided in CDCs Cirencester Area public Transport Study re Forum and Brewery sites.	Noted - plan to refer to IMH as Integrated Mobility Hub throughout and reference to be made to possible suitable locations as identified in CDC Cirencester Area Public Transport Study.
3		**Pg 26 PARA 5.8** paragraph further explains, "...but criteria to indicate the most viable location is set out in the supporting information to Policy AM 4." **AM4** criteria include a requirement for the IMH to be a terminus for a light railway between Kemble and Cirencester. It will be important that CTC demonstrate the deliverability of this requirement	Noted - plan revised accordingly
4		**Pg 27 clause 21** We suggest perhaps 'innovative methods of construction should be encouraged in order to help deliver net zero' rather than 'modern'.	Noted - plan revised accordingly
5		**TC1 and TC2** Could reference to 'in accordance with' (TC1) and 'not compromise, conflict or be in any other way incompatible' (TC2) be simplified to one phraseology to avoid challenge or uncertainty should the areas of change as the Masterplan progresses.	Noted - plan revised accordingly

6		**TC1 and TC2** advise against seeking to alter TC boundary, as presented in the adopted Local Plan, without taking account of evidence supporting the emerging Local Plan and TCMP.	Noted - plan revised accordingly
		06 ACCESS & MOVEMENT	
7		**pg 29 para 6.3** LCWIP is GCC publication	Noted and corrected
8		**AM1** Remove a-c and instead include references to those as explanation/ community ambition. Due to technical issues around parts of proposed routes being outside neighbourhood boundary and/or non land use planning matters.	Noted - plan revised accordingly
9		**AM3** Redraft, along the lines of: 'Development proposals which bring forward measures to enhance the pedestrian experience will be supported. These measures include….' Would also be good to see additional clause about making pedestrian routes more attractive and biodiversity-rich to encourage pedestrians to actually use them. Avoid new or "improved" cycle and pedestrian routes that are fine in terms of surfacing etc but that are not welcoming and that do not deliver on their potential to increase biodiversity connectivity.	Noted - plan revised accordingly
10		**AM4** Change policy wording to talk about physical infrastructure (ease of access and ability to accommodate) criteria rather than more operational, such as inclusion of long-distance coaches. Liaise with CDC to establish best policy mechanism for determining selection criteria and location.	Noted - Policy revised in consultation with CDC
11		**AM5** Suggest redraft 'Development which creates or enhances (remove 'effective connections through') public transport links with towns which are economically important to Cirencester will be supported.'	Noted - Policy revised in consultation with CDC
		07 DESIGN & BUILT ENVIRONMENT	
12		**Pg 37 7.13** Re references to planting more trees, be aware of need for scheduled monument consent in some parts of town so important to retain trees already in such areas.	Noted - no change necessary current main body text and policies adequate
13		**Para 7.14** suggest more ref to CTC public realm design guide	Noted - no change necessary current main body text and policies adequate
14		**7.32** re 'absence of local list' - there is one being developed as data comes forward.	Noted - no change necessary current main body text and policies adequate

15		**7.37** delete or amend paragraph as absence of list does not mean NDHAs are not protected in planning. NDHAs are identified through development management process.	Noted - plan revised accordingly
16		**7.38** beware must still be in tune with NPPF. Tightening policy wording makes NDHAs more obvious, not more protected.	Noted - no change necessary current main body text and policies adequate
17		**Pg 44 7.48** Beware if outline permission already granted, the development can't be forced to be net zero.	Noted - plan revised accordingly
18		**Pg 46 DESIGN CHECKLIST** establish the status of this checklist as expansion of policy or mini design code. Needs to reflect the different character areas and different architectural approaches in Cirencester. Seems very town centre focused. Unless a character area approach is undertaken, we would suggest simply referencing the Cirencester context, encouraging developers to take design cues directly from the town.	Noted - plan revised accordingly
19		**Pg 51 8.15** recommend separating out issues and more clearly setting out points relating to signage.	Noted - plan revised accordingly
20		**DBE1** Confusing start, wordy and seems to be about public realm. Seems to specifically apply to development of multiple units. What about single unity infills or intro of a unit number threshold. Checklist appears to be more a validation requirement rather than policy and couldn't be used as basis for refusal in planning. Should reference Cotswold Design Code.	Noted - Policy revised in consultation with CDC
21		**DBE2** Recommend amending first clause: Development proposals should demonstrate (delete: 'through a Design and Access Statement or Visual Impact Statement') how they will protect and enhance the following views, identified as important to the landscape and townscape of Cirencester:	Noted - Policy revised accordingly

22		**DBE3** Clause (a) Conservation areas are designated heritage assets, and thus the planning test that must be met is set out in the NPPF, paragraphs 200 through to 202. Clause (b) is problematic, as planning usually operates on use classes rather than more specific occupancy. The occupier or tenant could change at any moment, potentially undermining the argument for a permission just given, yet not empowering its removal. Retail premises could be merged to allow use by a pharmacist, for a vape shop to move in upon completion. We note that 'much needed services' is a subjective point. Clause (d) Is there a risk this could undermine the HMO policy, DBE 7? Does it facilitate a landlord unable to get HMO permission to formally subdivide into separate flats instead, and thus circumvent?	Noted - Policy revised in consultation with CDC
23		**DBE4** policy to be re-drafted to state that those buildings and structures listed in appendix 5 should be considered as non-designated heritage assets and the appropriate local and national policies applied to them and note that further NDHAs may be identified subsequently; as noted in para 7.41, appendix 5 is not a definitive list. There is no need to add anything further.	Noted - Policy revised accordingly
24		**Appx 5 NDHAs** Correct where images separated from text, mislabelled image and provision of clearer maps to show extent of NDHAs.	Noted – Mapping, images and text to be reviewed
25		**DBE5** there is inconsistency from Planning Inspectorate re this in NPs and CDC suggests we consider how similar approaches are received in other emerging plans. Should mention embodied carbon in policy and clarify Clause e. position on 'carbon offsetting' - re. not permitting it, do we actually mean to say that 'as a way of meeting the environmental requirements of the policy'? or should we be clarifying that to say that where a development proposal has sought to minimise impact, and still sought to offset any residual environmental harm, say from construction traffic, the Plan would welcome that commitment'?	Noted - Policy revised in consultation with CDC
26		**DBE6** CDC advocates approach, in spite of Gov. statement 13 Dec. 2023, as necessary to stay true to vision for the NP. Re. e) question if high performing buildings, meeting heating and lighting requirements in this way can really meet all needs of occupants, where for example may have electric car, home working etc	Noted - Policy revised accordingly

		08 QUALITY PUBLIC REALM	
27		**QPR2 a)** define 'unacceptable' to avoid subjectivity. **QPR2 b)** question appropriateness of expanding Ciren Town Centre Public Realm Design Code to whole town. Suggest 20th and 21st century suburbs should reflect immediate setting.	Noted - Policy revised accordingly
		09 THE 20 MINUTE NEIGHBOURHOOD	
28		**TMN1** consider application of policy to single unit infills/smaller unit numbers as it seems more applicable to multiple unit developments. Consider introducing a unit number threshold?	Noted - Policy revised accordingly, avoiding the need to apply threshold numbers
29		**TMN1 a)** 'contribution' in second sentence undermines first as suggests financial value attached.	Noted - Policy revised accordingly
30		**TMN1 b**) Suggest move to 06 A&M section to improve clarity and focus on this important policy area.	Noted - plan revised accordingly
31		**TMN1 e)** Recommend additional wording such as 'New Development should….'	Noted - plan revised accordingly
		10 THE NATURAL ENVIRONMENT	
32		**10.21** Local Nature Recovery Strategy will be county level so not in detail suggested here and 'recommended off site opportunities' have not been identified. If they are to be included, would need to be agreed with the landowners and mechanisms put in place to deliver off site Biodiversity Net Gain (BNG) in these locations.	Noted - plan revised accordingly
33		**10.23** Reads like policy but not and would present challenges e.g. required consultation with local ecology experts and focus being in town greenspaces given potential disturbances from people and dogs etc.	Noted - plan revised accordingly
34		**Para 10.42** Please note that our Green Infrastructure Strategy is no longer draft.	Noted - plan revised accordingly

35		**Page 64,65,Appendix04** CDC objects to the inclusion of a number of sites: Ashcroft Roads Bowls Club, Brewery Court, Catalpa Square, Cricklade Street/West Way seating, Old Tesco Supermarket Seating Area, Market Place. The allocation of these sites would unduly constrain the town centre masterplan, and thus we believe they are not in general conformity. At no point does the NPPF describe or suggest that Local Green Space covers town squares and smaller incidental urban space. Building on this last point, we believe there are other spaces which do not qualify for this reason - the Cirencester Outdoor Swimming Pool, Quiet Garden at the Quaker meeting House. Also, Abbey Grounds, the Amphitheatre, Allotments, Cemeteries and Churchyards, St Michaels Park, Cirencester Park, are already subject to strong constraints. We question whether designating these as Local Green Spaces does anything other than double down on these constraints. In planning terms this is unnecessary. The Plan also seeks to designate a number is sports pitches, both those linked to the town's schools and sports clubs. The amenity of these sites is already protected – their designation as Local Green spaces would prevent their development, even if alternative space could be found. This feels unduly onerous – in particular for the schools, which may find their opportunity for expansion on-site constrained, even if further space is found for sports pitches. We would advocate that sports pitches are best suited for LGS designation where they serve additional functions within the townscape – for example within the setting of heritage assets. Question need for 'Local Community Space' column? Overall, we are concerned that currently there is limited evidence to persuade the examiner why any of these sites are of particular local significance, beauty, historic significance, recreational value, tranquillity, wildlife or for any other reason. Likewise, we would expect to see evidence which demonstrates why the sites are 'demonstrably special' to the local community as stated in NPPF 2023, paragraph 106, clause (b) such as, but not limited to letters from the local community, schools or local groups and societies. Recognising that the Plan is currently at Regulation 14, which may well assist with generating this evidence, we strongly recommend robust supporting evidence is presented to support the Regulation 16 submission.	Noted – List of sites reviewed and amended

36		**NE1** Duplicates a higher tier policy and so not consistent with NPPF para 16(f). Ref to 'Development' implies 10% BNG applies to all developments, which is beyond mandatory requirements of the Environment Act - where is evidence this is appropriate? Also, second expectation in policy 'or replace as near to the development as possible' risks creation and enhancement of unconnected spaces, where an opportunity to enhance connected green infrastructure could be supported to much better effect. Could undermine vision in Policy NE3.	Noted - Policy deleted
37		**NE2** It may be more appropriate to refer to the creation of areas of natural or semi-natural habitat.	Noted - Policy amended
38		**NE4 Clause (d)** Removal of Highway verge is a matter for the County Council. In most instances will not require consent from CDC, so is beyond the remit of the Neighbourhood Plan	Noted - Policy NE4 Clause (d) deleted
39		**NE4 Clause (e)** While CDC supports the ambition, and will encourage the same through its design policies, as drafted we consider this clause to be a community action not a policy.	Noted - Policy NE4 Clause (e) deleted
40		**NE5** Duplicates a higher tier policy and so not consistent with NPPF para 16(f).	Noted - Policy NE5 deleted
41		**NE6 Clause (a)** does not align directly with the approach to Local Green Space, as set out in the NPPF.	Noted - Policy amended
42		**NE6 Clause (b)** Need to clarify references to 'community green or open spaces' as 'LGS' . If the intention is that this clause relates to development on designated Local Green Spaces, it is unnecessary - there is already an established approach, through Green Belt policy.	Noted - Policy NE6 Clause (b) deleted
43		**NE7** Uncertain how this could work as gaps where Cirencester is closest to neighbouring settlements are outside parish boundary. More robust approach may be possible where gaps sit within other neighbourhood areas. Suggest second clause is unworkable as impact can't be compensated for nor mitigated offsite.	Noted - Policy amended
		11 THE LOCAL ECONOMY	
44		**LE1 (a)** Question use of this clause - Permitted Development rights and changes to use classes enable changes without permission so very limited use for this policy. Should this policy be retained, recommend addition of some text such as 'insofar as planning permission is required,...' Same applies to economic uses outside town centre.	Noted - Policy amended

45		**LE1 c)** Suggest ineffectual - limited range of economic use classes and well developed range across town so in most instances, alternative premises will exist.	Noted - Policy amended
46		**LE1 d)** what is meant by 'flexible growth' and adaptation of existing employment areas, and does this only apply to Love Lane? It is not evident how a decision maker should react to this criterion.	Noted - Policy amended
47		**LE2 Clause** (b)1 is directed at employment land, whereas Clause (b)2 would appear to be directed at residential extensions. We cannot really see how Clause (b)2 follows from the introductory text and would suggest that including a residential buildings clause in this section confuses rather than enables. Homeowners will often already enjoy permitted development rights to extend their properties, enabling homeworking.	Noted - Policy amended
48		**LE4** Clause (b) is awkwardly phrased. There are two sub-clauses referencing location, 'Where their location provides practical opportunities to do so…' and 'as appropriate to their scale and location,…' which we think could be picked up in one sub-clause to enhance readability and understanding.	Noted - Policy amended
		12 WELLBEING AND COMMUNITY	
49		**WBC1** It is difficult to conceive of clauses **(a) (c)** and **(f)** as planning policy. We would suggest editing this policy and retaining these clauses as community actions/aspirations.	Noted - Policy amended
50		**WBC2** needs evidence of health implications from development proposals. Not clear that the threshold in the policy is consistent with National Policy and regulation; for example, it needs to be consistent to the NPPG https://www.gov.uk/guidance/making-an-application#Design-and-Access-Statement; at this time it is not clear that the threshold is well-justified.	Noted - Policy deleted
51		**WBC3** Suggest policy focus should be on public open spaces rather than Green Infrastructure as not all GI would be appropriate for public access e.g. natural water management and wildlife connectivity.	Noted - Policy amended
52		**WBC4** Policy expects maintenance through social management plans but there is no policy requirement for such agreements in either the Local Plan or the NP. Suggest more flexible mechanism.	Noted - Policy amended

53		**Para 12.38** suggests support for existing play spaces but policy requirement is to create new opportunities on sites of more than 10 houses, without reference to existing in the locality.	Noted - Policy amended to reflect this
54		**WBC5 (a)** There are no ACVs in the NP and it is beyond power of NP to prevent an asset from closing - that is a function of viability, not planning. Blanket ban on change of use is not appropriate and could be permitted development so unrealistic.	Noted - Policy amended to reflect this
55		**WBC5 (b)** Recommend refocus on viability, not demand.	Noted - Policy amended
56		**WBC5 (d)** This clause just restates purpose of CIL - headroom for additional contributions will be limited, and subject to site specifics, such as highways access and improvements, flooding etc.	Noted - Policy amended
57		**WBC6 (b)** Look at how this interacts with DBE3, which seeks to apply stricter criteria to upper floor conversions.	DBE3 supports upper floor conversions to residential usage and is compliant with WBC6, minor amendments made to text
58		**WBC7 (b)** To manage expectation, we would suggest addition of 'Insofar as development consent is required…'	Noted - Policy amended
59		**WBC8 (a)** the likelihood is that such measures as this envisages are not going to be within land use planning, but instead in highways planning, through mechanisms such as Traffic Regulation Orders. As such, the clause may sit better as a community aspiration.	Noted - Policy amended
	Cirencester Wildlife Group	**04 AIMS & OBJECTIVES**	
60		**Para 4.2 and AM3** - Would like inclusion of commitment such as 'Over time, the aim is to maximise pedestrianisation of the town centre and to displace all through traffic as well as all motorised access other than for emergency or essential purposes'	Noted - wording has been strengthened to increase safe pedestrian and cycle access

		05 CIRENCESTER TOWN CENTRE	
61		Displacing traffic and motorised transport infrastructure. Opportunity to replicate Car-free developments being created in Amsterdam for example. Support designing without car-dependency, but instead ensuring green corridors both radially and in/out of town with good pedestrian, cycle and wheelchair connectivity. Support IMH in town centre and peripheral multi-storey carparks and electric car-sharing schemes.	Noted - no change necessary current main body text and policies adequate
62		Flood resilience and the environment - support for increasing green spaces and minimising hard-standing areas such as streets and parking. Tree planting (Woodland Trust recommends 30% of the site of a new development) can enhance soakaway potential where limited in a floodplain.	Noted - Principle 18 amended
		06 ACCESS & MOVEMENT	
63		**AM1** Recommend enhancement to include Green corridor connectivity in line with the Design Checklist: The Cirencester Spoke & Wheel Cycle Network should be enhanced to include not only cycle and footpath but also wildlife connectivity. This should be delivered as part of any development on or adjacent to the existing planned or proposed network.	Noted - Policy amended
64		**NE4 c)** Enhance with *'removal of existing green and blue infrastructure within the town will be resisted. Instead, any development must take opportunities to enhance green and blue infrastructure by removing barriers to connectivity, both within and at the perimeter of the development area. To note this will require special consideration across the dual carriageways.'*	Noted - Policy NE4 a) more appropriate to amend and now reflects removing barriers to connectivity
65		**AM1** Further enhance by adding additional routes: d) completion of a new route connecting Chesterton and the Steadings, (via existing LCWIP route 19) past the Amphitheatre and across the dual carriageway to Phoenix Way. e) completion of a circular perimeter route around the entire urban perimeter of Cirencester in particular to the N and E from Hare Bushes to Kingshill Country Park, but also with the aim of improving current restricted access across Cirencester Park. f) completion of an inner loop based on the Hare Festival way (completed via a redeveloped Forum and St Michaels Park).	Noted - routes added and now incorporated as main body text

66		Correction to Spoke and Wheel Map - footpaths run out in Kingshill Meadow on one side, and next to the new allotments on the other. Was drawn in as an existing route in the Spoke and Wheel map but it doesn't yet exist.	Noted - map to be checked and amended before final submission and publication
67		**Para 6.10, 6.12 & 6.13**, suggests there is limited bus infrastructure. A particular problem is that Cirencester hospital only has a bus stop for buses going in one direction towards the RAU/Deer Park school roundabout. There is no bus stop at the hospital for buses coming from the RAU/Deer Park school roundabout into Cirencester.	Noted - no change necessary current main body text and policies adequate
		07 DESIGN & BUILT ENVIRONMENT	
68		**DBE1 -** Recommend Streets and Spaces should be strengthened along these lines. '*New developments should include connectivity in the form of paths suitable for foot, cycle and wheelchairs and will not be permitted to include new streets or hard standing especially those designed for passage or parking of private vehicles. These paths should provide connectivity both radially and in/out of town to enhance Cirencester's move to wheel and spoke connectivity across the urban area. Developments should be designed to minimise essential vehicle access points, allowing pedestrianisation of existing streets or parts of streets where practical.*'	Noted - no change necessary current main body text and policies adequate
		09 THE 20 MINUTE NEIGHBOURHOOD	
69		The aim should be for new development to improve foot/cycle/wheelchair connectivity and avoid any new streets designed for heavy, motorised vehicles. Going further, the policies suggest increased pedestrianisation and reduced motorised traffic access in the urban centre.	Noted - no change necessary current main body text and policies adequate
		10 THE NATURAL ENVIRONMENT	
70		**Para 10.6** Neighbourhood Plan talks about "re-wilding", which we recommend should be changed to "wilding" or "biodiversity enhancement"	Noted - term changed throughout
71		**Para 10.7** states "… a realisation of how much value to mental health there is in spending time in these spaces", but we recommend that this should be changed to "… a realisation of the positive mental health benefits of spending time in green spaces immersed in nature".	Noted - text amended

72		**Para 10.10** Recommend addition of 'the natural environment' into the following sentence "…the Neighbourhood Plan has an opportunity to strengthen and better protect the natural environment within planning policies, areas identified by stakeholders and the community".	Noted - text amended
73		**Section 10.11** introduces the term "biodiversity" – this fits in with the policy on biodiversity net gain. We recommend consistency between using the terms wildlife, nature and biodiversity. So using the terms biodiversity, habitats and species would be better in the neighbourhood plan. It also fits in more closely with the CDC Local Plan policies on biodiversity, protected and priority species, priority habitats, etc.	Noted - whilst consistency of terminology and using the same words as used in other statutory documents is important, this change would be significant to implement across the whole document and on balance there is appropriate reference to habitats and species, as well as nature and wildlife
74		**Section 10.11** – also needs to change "re-wilding" to "wilding" or "biodiversity enhancement" projects. We would also recommend that "planting schemes" is changed to "enhancement projects to support nature's recovery"; it's not always just about planting, as allowing nature to restore itself (e.g. through the natural regeneration of trees and scrub to create woodland) can be much more beneficial and likely to be successful in the longer term.	Noted - wording amended throughout
75		**NE1** recommend should read: "Ensure all development provides a minimum 10% Biodiversity Net Gain in an ecologically meaningful way, providing both appropriately designed biodiversity-rich green infrastructure within new developments and ensuring that any off-site requirements focus on newly created and restored habitats in line with the Lawton principles of more, bigger, better and joined up. Off-site delivery of BNG must make a defined contribution towards nature's recovery in the most appropriate location for the specific habitat types that are required and as close to the town as possible."	Noted - need to cross refer with reference 36 and deletion of policy
76		**Para 10.12** refers to biodiversity as the variety of ecosystems or habitats that can and do exist and the genetic diversity they contain. This is not quite correct. We recommend the use of a definition in line with the CDC Local Plan and national planning policy.	Noted - wording added to cross refer with the published list of habitats and species of principal importance in England

77		**Para 10.13** currently refers to a "biometric" being used to calculate BNG and this should be changed to the Statutory Biodiversity Metric (as published by Defra). Biometrics are biological measurements or physical characteristics that can be used to identify individuals (e.g. fingerprints and facial recognition) and so refers to something else entirely.	Noted - wording amended
78		**Para 10.16** states "… especially during times such as the recent pandemic when lockdown reportedly escalated the benefit of the natural environment". We recommend that this is amended to say "… especially during times such as the recent pandemic when lockdown reportedly escalated people's awareness of the benefits of the natural environment".	Noted - wording amended
79		**NE2** recommend that the terminology is changed from "rewilding" to wilding in the title of the policy to match previous comments. Para 10.18 – again, the term "re-wilding" is used and this should be amended to "wilding".	Noted - wording amended to read natural and semi-natural habitat - see reference 37
80		**Para 10.21** The paragraph overall could be simplified. For example, "In conjunction with the emerging Local Nature Recovery Strategy, green infrastructure and biodiversity net gain, new developments should contribute towards the enhancement of green spaces and green corridors within the town for biodiversity and people as identified within the Cirencester Neighbourhood Plan."	Noted - see reference 32
81		**Para 10.22** recommend adding the word "enhance" as follows, "… strengthen in development a requirement to protect, extend and enhance biodiversity…"	Noted - wording amended
82		**Para 10.23** lists a number of specific biodiversity requirements in development, but it appears that these are not exhaustive, as it says "include". Are these the specific requirements referred to in para 10.22? If so, then the list should encompass all the biodiversity enhancements that could be implemented by developers as part of their proposals.	Noted - see reference 33
83		**Para 10.23.5 and 10.23.6** should refer to "wilding" rather than "re-wilding" as recommended previously.	Noted - wording amended
84		**Para 10.23.3** recommend that the plan should identify who the "local wildlife experts" are to ensure that developers know where to go to seek advice. Would this be from ecologists at CDC, experts within CTC, Wildlife Trust or elsewhere?	Noted - wording amended removing reference to local experts, stating best practice landscaping as a principle

85		Suggest that perhaps the Cirencester Green Spaces Strategy, a Green Infrastructure Strategy (in line with the one produced by CC) or another such document should be produced with the local wildlife experts to provide developers with the information they need to be able to identify how they should be incorporating biodiversity into their development proposals in different parts of the town?	Noted - no change necessary
86		**Para 10.24** is welcome	Noted - no change necessary
87		**Para 10.26** should also refer to gaps underneath fences for hedgehogs and the creation of a network of "hedgehog highways". We recommend that reference is made to the Gloucestershire Wild Towns report and CDC's green infrastructure strategy in this section. We also recommend reference is made to the emerging Local Nature Recovery Strategy, which is a requirement of the Environment Act 2021. This is being produced by the Gloucestershire Local Nature Partnership for Gloucestershire County Council and is likely to be published next year. The Gloucestershire Wildlife Trust have already created a nature recovery network map, which is published on line. This should be used by developers to identify what, where and how they can maintain and protect biodiversity and wildlife corridors within their development proposals.	Noted - reference now made to the wild towns report and infrastructure strategy
88		**Para 10.32** is also welcomed re protecting the "nocturnal integrity" of wildlife corridors and reducing light pollution	Noted - no change necessary
89		**Para 10.33** – the planting of new hedgerows should ensure that they are native and species-rich (at least 5 woody species), but also locally characteristic. The planting of certain trees and shrubs would also provide foraging or breeding habitat for species, for example the planting of Wych Elm for White-letter hairstreak butterflies. It is therefore important to recognise the value of obtaining species records from the Gloucestershire Centre for Environmental Records (GCER) to inform landscaping proposals.	Noted - reference now made to the GCER
90		**Para 10.35** One of the key objectives should be to enhance connectivity for specific species, especially "priority species" such as hedgehogs through the creation of gaps under fences and through walls – otherwise this is not carried through from para 10.26.	Noted - wording now includes reference to connectivity for priority species
91		**Para 10.39** – should be changed to refer to the City Bank Local Nature Reserve (LNR), which is a statutory designation of the site by Natural England for people and wildlife under Section 21 of the National Parks and Access to the Countryside Act 1949.	Noted - wording amended

92		**NE5** Strengthen with regard to development in the urban centre as follows: '*For central locations, all development must lead to a reduction of hard non-draining surfaces. There should be a target minimum of 67% green space in line with the national average for urban green space (UK National Ecosystem Assessment, Chapter 10 Urban, Table 10.4, p368) with a 30% tree cover. This should include green verges, hedgerows and/or trees along pathways as well as concentrations of green spaces. All hard surfaces should be permeable wherever practical.'*	Noted - see reference 40 - Policy deleted
93		**NE5** Revise to include *'Development proposals should demonstrate how they will reduce flood risk through design and landscape measures, reducing run-off by limiting or reducing hardstanding with green space or permeable paving, also sustainable drainage systems to slow water, and measures such as tree planting to retain water.'*	Noted - see reference 40 - Policy deleted
94		**NE4 d) and e)** Revise to say '*d) Both Developments and Domestic planning applications e.g. for extensions or garages should not result in a net loss of green space or drainage and this can be achieved e.g. by using permeable surfaces and/or green rooves. e) Removal of lawns and replacement with hardstanding will not be permitted as part of any development requiring planning approval and is strongly discouraged due to impact on drainage and flood risk.'*	Noted - see reference 38 and 39 - Policies deleted
95		**NE6** Extend to include more Local Green Space designations by updating Table 2 and Appendix 4 to revise 2 and include 7 additional green spaces as listed here: Cirencester Primary School's Playing field (Area A, see map below), which is adjacent to the river and Victoria Road Wildflower meadow (already designated). City Bank Glade (Area B). Opposite and across the river from Cirencester Primary School Playing field and adjacent to City Bank LNR (already designated). Opportunity Group woodland (C) adjacent to and immediately upstream of City Bank glade towards Beeches Road carpark. The woodland and footpath along the main branch of the Churn downstream of the Barn Theatre between Beeches Road and the A419 Swindon Road Dual carriageway (D). A strip of woodland between the A419 Swindon Road Dual carriageway downstream of the Beeches road bridge and Watermoor Point on the Tesco roundabout (Area E). Powell's school playing fields and adjacent grassland - between the river and Powell's School – mentioned in Policy DBE2 g). Football pitches presumably owned by Cirencester Town FC behind the Corinium stadium (also shown in a map in Appendix A).	Noted - see reference 41 and 42 - NE6 clause a) amended clause b) deleted

96		**Suggested Corrections to Local Green Space designations** 41/45/46 2 Acre field and Thistle Park actually extends further east as open grassland to include the undeveloped area up to Cranhams lane. The description of Area 31 Kingshill Playing Field in Appendix 4 needs to be extended. Although much of the area is playing fields and a skate park as described, it also includes some ecologically valuable areas (see map below). Kingshill meadow itself (A) is managed as species-rich grassland and also includes scrub and a pond. Area B is of great ecological value with extremely thin soil over limestone, making it unsuitable for football, but suitable for orchids and several hundred thriving there including rare species. Area C is rough ground probably where quarry waste was deposited and is of less ecological interest. NOTE: The orchids enjoy accidental protection from trampling as the area is not cut while surrounding amenity grassland is cut frequently and dog walkers and others tend to walk around and avoid Areas B and C as a result. So there is an advantage in maintaining their current low profile in this way.	Noted - amendments to be made in line with advice and comments from Cotswold District Council
97		**NE7** Add additional policy NE7 '*Build and sustain partnerships with community and conservation groups and charities to help conserve local green spaces. Give due consideration to proposals to enhance green space for biodiversity, the creation of new or extended LNRs, and support efforts to record and monitor local wildlife. Monitor progress (recording signs of success and setting priority targets) on an annual basis through discussion between Cirencester Town council and partner groups such as/including Cirencester Wildlife Group.*'	Noted - this is a community aspiration outside the planning remit of the Neighbourhood Plan, establishing a Cirencester and Churn Waterways and Environment Partnership is being recommended and followed up by the Town Council
98	**National Highways**	**06 ACCESS & MOVEMENT** We welcome those policies which will improve pedestrian and cycle links between development areas, and which will safeguard and improve local facilities and services, leading to greater self-containment and reduce the need to travel which we see are proposed in the aims and objectives and Policies AM 1, AM 2, AM 3, AM 4 and AM 5.	Noted - no change necessary
99	**Historic England**	It is an impressive document in its scope and depth of evidence and policy….particularly impressed by those elements of the Plan which relate to the town's historic character and related considerations	Noted - no change necessary

100		**TC1** Should the provision, that TCMP will be supported provided it is in accordance with design and development principles within the plan, be extended to include accordance with other areas of Plan policy, to ensure the sustainable outcomes being sought for the town, given the holistic and interrelated nature of the Plan's policies?	Noted - wording amended in main body of text
100	**Natural England**	Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information. (NOTE: Natural England have provided generic information regarding things to consider when developing a NP)	Noted - no change necessary
101	**Cotswolds National Landscape**	**07 DESIGN & BUILT ENVIRONMENT** - Recommend that where section 7 of the CNDP discusses views of the town to and from the CNL such as of St John Baptist church from within Cirencester Park, it makes explicit reference to the Cotswolds National Landscape and the need to ensure that views from and to the National Landscape and the tranquillity of the National Landscape are not adversely affected by development within the Neighbourhood Area.	Noted - wording amended in main body of text
102	**Bathurst Estate**	**PLAN PERIOD** We note that the Vision refers to a period to 2033, but it is unclear if this is the period that the CNHP is looking to? BDL would encourage the Forum to look over a plan period up to at least 2041 to align with the potential emerging Local Plan.	Noted - Plan period amended
103		**VISION** Recommend Vision mentions retail uses which are a key component in the Town Centre and in a state of flux at the current time.	Noted - there is sufficient reference to retail within the Plan, retail is not referenced within the Vision as it does not explicitly form part of the overall aims and objectives of the Plan or policies
104		**PARA 4.7** Request clarity on why "age-specific residencies" should be avoided, given 1.40 confirms town has above average proportion of people over age 65?	Noted - Chapter 2, Chapter 5 and Policies DBE3 and DBE7 provide the evidence base for this aim and objective

105		**TC1** This policy should take account of the Cotswold Design Guide and ensure the design and development principles align or where they don't to specifically explain why this is the case.	Noted - reference to the Cotswold Design Guide is included in the main body of the text
106		**AM1 a)** The creation of a link from Tesco via Siddington to the Steadings is supported, but it is unclear how this would be delivered. BDL is delivering a number of the connecting routes from The Steadings to the Town Centre as well as improving existing road crossings and junctions.	Noted - no change necessary
107		**DBE1 h)** refers to building heights and limits this to 12 metres. Question need for this as not evidenced and seems to contradict f). Suggest **DBE2** can be used to limit taller buildings in key landscape and townscape views.	Noted - Policy amended
108		**DBE3** Suggest policy heading also refers to redevelopment and that opportunities outside of town centre e.g. buildings at former Chesterton Farmstead, should also be covered by policy.	Noted – Policy directly relates to development within the defined town centre boundary, no change made as existing Local Plan policy supports redevelopment opportunities as described
109		**DBE4** Question point of this as guidance already in NPPF.	Noted - Policy amended see reference 23
110		**DBE5 and DBE6** Should align with Written Ministerial Statement issued 13th December 2024 re Local Energy Efficiency Standards. Regarding efficiency standards and flexibility in their application where it is demonstrated that meeting the higher standards is not technically feasible.	Noted - Policies amended see reference 25 and 26
111		**LE1 c)** Suggest evidence may not relate to viability of current use, but lack of market interest. Therefore, policy should also refer to a period of marketing and if no interest to allow a change of use. It is not considered appropriate to only accept a loss if an alternative site can be identified - suggest delete this requirement.	Noted - Policy amended
112		**WBC2** Health Impact Assessment is proposed in the emerging Local Plan - suggest delete this policy to avoid repetition.	Noted - Policy deleted see reference 50

113	**Royal Agricultural University**	**DB7 HMOs** - RAU are currently preparing a Masterplan that will accompany the submission of the Innovation Village Outline Application, this addresses the anticipated student growth and accommodation options for this. The RAU would welcome direct discussions with the Town Council about the student population and HMOs within the town.	Noted - no change necessary
114		**02 Cirencester of Tomorrow 2.31 to 2.36**. It is considered that supporting text.... regarding recognition that there is a "shortage of industrial space here for existing business to grow into and with demand likely to increase once the A417 'missing link' is completed, then recognising that there is some provision for employment land as the proposed Innovation Village at the RAU...." could be made to recognise the specific policy allocation in the Local Plan, in this instance the Special Policy Area of EC4, under which the RAU site is allocated.	Noted - wording amended to include reference to the proposed Innovation Village
115		**VISION** suggest reference to supporting Cirencester's strong academic institutions, including RAU could be included within the scope of the vision.	Noted - wording amended in main body of text but not appropriate to include as part of the Vision
116		**AIMS & OBJECTIVES** suggest reference to supporting Cirencester's strong academic institutions, including RAU could also be included here.	Noted - reference to academic provision now included
117		**DBE1** Support policy aim but concern that a checklist approach can be too prescriptive and unintentionally limit innovation and outstanding design.	Noted - checklist now referenced as principles
118		**DBE1** Elements of policy which duplicate Cotswold Design Code.	Noted - Policy amended, see reference 20
119		**DBE5** Requirement for non-residential development, design and construction to comply with BREEAM standard and achieve excellent accreditation etc is onerous on developments which also include other economic benefits and job creation to town - BREEAM should therefore be more proportionate a policy requirement.	Noted - no change as this is a reasonable expected standard to achieve
120		**DBE7** HMOs It is considered that the policy provides additional barriers, particularly criteria d) and e), which could ultimately limit HMOs and the important benefits they have on the towns housing market. It is also considered that further support could be provided within the policy or wider plan to any future proposals to purpose built student accommodation on the RAU site.	Noted - this is an important Policy and remains unchanged

121		**NE6** LGSs It is considered appropriate in this instance to remove the RAU's sites from the Potential Local Green Spaces policy as the recreational benefit they provide is already secured by the Local Plan which also provides the required flexibility for the RAU to bring forward their Innovation Village proposals without further constraint.	Noted - amendments to be made in line with advice and comments from Cotswold District Council
122	**Thames Water**	Recommend separate policy covering **water supply and wastewater infrastructure** in NP to ensure appropriate upgrades to infrastructure are delivered alongside development to ensure sustainability. See full comment for detail. Recommend policy supporting text as follows: "Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades." "The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."	Noted – no change to Neighbourhood Plan due to this being more relevant and appropriate to the Local Plan
123		Recommend policy covering **water efficiency and sustainable design** in the NP - Proposed policy text: "Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."	Noted – no change to Neighbourhood Plan due to this being more relevant and appropriate to the Local Plan
124		With regard to **surface water drainage**, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."	Noted – no change to Neighbourhood Plan due to this being more relevant and appropriate to the Local Plan

125	**MOD**	The area covered by any Cirencester Neighbourhood Plan will both contain and be washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites (including RAF Fairford and the Central WAM Network). As protected in Para101 of the NPPF.	Noted - no change necessary
126		MOD request that; when drafting policy and guidance which addresses biodiversity, ecology, and Biodiversity Net Gain; the Council bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and the MOD should be consulted where any element falls within the marked statutory safeguarding zone.	Noted - no change necessary
127	**Gloucestershire Wildlife Trust**	**NE3 -** reference is made to the future Local Nature Recovery Strategy (LNRS) which is yet to be developed. However, we do already have a set of very good nature recovery maps for Gloucestershire, which will feed into the LNRS, that establish opportunities for improving connectivity (including low, medium and high priority) for different habitat types. This is referred to as the 'nature recovery network'. It would be helpful to make reference to this in your plan. It can be found here: https://naturalcapital.gcerdata.com/.	Noted - main body text amended
128		**NE3** - In relation to this, recommend new policy - 'Development should not be permitted on designated biodiversity sites or core areas of local ecological networks, as defined by Gloucestershire's Nature Recovery Network'. This aligns with paras 181 and 185 of the NPPF and EN8 of the Cotswold District Local Plan. You could go further to state that there is a preference against development on medium and/or high opportunity nature recovery areas as per the nature recovery network, and if there is development within these areas, that maximum gains for biodiversity are sought. It would be wise to discuss the latter with CDC to ensure alignment with the upcoming new local plan.	Noted - new clause d) added
129	**Gloucestershire County Council**	**AIMS & OBJECTIVES** Suggest including reference to UKHSA guidance on flooding and health in outlined regulations to mitigate risks.	Noted - reference to the UKHSA guidance now included
130		**06 ACCESS & MOVEMENT** Suggest NP may wish to refer to the South Cotswolds CPS document within the adopted Gloucestershire Local Transport Plan.	Noted - reference to the document now included

131		**DBE1** To mitigate carbon emissions, development should be prioritised in locations with existing public transport infrastructure to minimise private vehicle use.	Noted - no change made as this would undermine the Plan's emphasis on improving public transport infrastructure and provision
132		**DBE5** Suggests measures new developments should provide within themselves should include: EV charge points above and beyond DHLUC Building Regs new “Approved Document S: Infrastructure for the Charging of Electric Vehicles”, design in line with Passivhaus principles. Also proposed CDC should adopt an SPD on "climate change" for compliance of new developments and application when retrofitting. Proposes a Construction Environmental Management Plan at planning stage can ensure construction methods are sustainable and environmentally conscious.	Noted – policy amended
133		**09 THE 20MNH 9.10.1** GCC officers note the plan’s ambition to address diverse and affordable homes. In doing so, the plan should ensure that such housing provisions will provide the highest standards of accessible and inclusive design and that accessibility to the facilities and green space is a primary consideration	Noted - no change made
134		**9.3** on strengthening local economies: In considering the role that businesses play in communities, we would also encourage plan-makers to share the 2021 Director of Public Health annual report Sources of Strength: Securing Gloucestershire's health and wellbeing through an anchor institutions approach, with all new and existing businesses in Cirencester. Anchor institutions are large organisations that are unlikely to relocate and have a significant stake in their local area.	Noted - main body text amended to include reference to the report and approach

Table 4 – Responses from Members of the Public and Other Organisations

Reg14 Commonplace Comments			
Neighbourhood Plan Section	Policy Area	Full Comments	Summary of Key Issues/Concerns from the Community
Vision		Much of this vision is very idealistic. It would be great if much of it was brought into being. We love living in Cirencester and although there are some problems, on the whole we feel extremely lucky with our environment and how it is managed. Thank you for your efforts.	
		I welcome this bold and forward-thinking vision, Cirencester needs to evolve and adapt to create a thriving place to live that protects its unique heritage. I appreciate the work that the town council are doing to realise this vision. Cirencester desperately needs more public transport options for residents. Too much of Cirencester is built around the car, and when driving is the only option then the streets get filled with cars. Consequently so much of the townâ€™s public space is dedicated to storing private vehicles. And the more space dedicated to cars, means less space for greenery, trees, community spaces, benches, fountains, everything that makes a space interesting and attractive. It would be great to see more pedestrianised streets in Cirencester, even Cricklade Street which should be fully pedestrianised is not! Anyone who has attended the Advent Market knows how buzzing and bustling the town can be when a bit more space is given over to pedestrians. This is something that should be adopted on a permanent basis as it creates a safe and attractive environment for people young and old. Perhaps a pilot scheme could be implemented that closes off some streets to make them more pedestrian friendly and allow pop-up stalls and outdoor seating.	Would like to see more public transport options and fully pedestrianised areas (Cricklade Street should be but is not) to reduce cars in town and encourage more more greenery and community spaces.
		Coates Parish Council is generally supportive of the aspirational vision for the CNP. Suggest the vision also refers to access for health care and education	Suggest vision should refer to access for health care and education.
		This is good background information.	

1 The Cirencester Context		Coates Parish Council is generally supportive of section 01 The Cirencester Context but is concerned about paragraph 1.55 where the CNP highlights that the international market is under-developed and refers to the 50,000 Japanese tourist who visit the Cotswolds every year concentrating their visit to better known tourist destinations other than Cirencester. We do not think it would beneficial to Cirencester to end up in a similar situation as tourist destinations such as Bibury and Bourton-on-the-Water. If Cirencester were to become over run with international tourists, it would become less desirable to those living locally. Moreover, it is not clear how much additional revenue international tourists arriving on a coach tour stopping for a brief visit in Cirencester would generate. Section 1.8 refers to Cirencester Park Providing extensive public daytime access, but should be updated as from 15 march free public access is being denied and will require payment or a pass	1.55, 2.22, 2.23 concern about highlighting international tourism here due to concern about risk of being overrun as Bibury is. Balance to be struck for residents, desirability of living locally and risk of ancient sites being damaged. 1.8 Ref to Cirencester Park as providing extensive public daytime access to be updated as do photos of Cirencester Park entrance.
		1.53 Tesco has "downsized" and the Brewery area is very dreary.	1.53 Concern about Tesco "downsizing" and dreary Brewery area.
2 The Cirencester of Tomorrow		An ambitious vision. Let's hope some, at least, of it can be realised.	
		I am utterly unclear as to what the aspirations are! What are the proposals? My suggestion for transport would be: 1. Impose a 40mph speed limit on the ring road where they pass within 1/4 mile of residential areas. 2. Add separate cycle lanes wherever the road is wide enough, and if that means reducing two lanes of cars to just one in places, so be it. 3. Increase massively the number of pedestrian crossings on busier roads, and set them to prioritise pedestrians over vehicular traffic. 4. Have free parking outside the town centre, or paid for parplys free (small) bus shuttservice. Preferaelectric.	Suggest: 1. Impose a 40mph speed limit on the ring road where they pass within 1/4 mile of residential areas. 2. Add separate cycle lanes wherever the road is wide enough, and if that means reducing two lanes of cars to just one in places, so be it. 3. Increase massively the number of pedestrian crossings on busier roads, and set them to prioritise pedestrians over vehicular traffic. 4. Have free parking outside the town centre, or paid for parplys free (small) bus shuttservice. Preferaelectric.

		Coates Parish Council is generally supportive of section 02 The Cirencester of Tomorrow, but would like to highlight their concerns regarding some of the content. regarding paragraphs 2.22 and 2.23, if Cirencester were to become over run with international tourists, it would become less desirable to those living locally.Â Â Moreover, it is not clear how much additional revenueÂ Â tourists arriving on a coach tour stopping for a brief visit in Cirencester would generate.Â Â It is not clear how tourists visitingÂ Â the Amphitheatre, which is noted in the CNP as a 'key featureâ€™ would boost the the local economy.Â Â Additional tourist visiting such a site are likely to cause more damage to the ancient site and disruption to the local community. Section 2.9 states that the town suffers from over-reliance on cars, and there is a perception that cars are unwelcome, but in reality cars are the main means of transport from neighbouring villages on which the town depends for much of its business. 2.16 states that the challenge is to provide long-stay parking at the periphery of the town, but this is inappropriate for people needing quick business access. The Plan appears to favour seasonal tourists over permanent nearby residents and 2.39 refers to reducing spaces given to vehicles for parking. A vibrant market town needs regular customers coming in for business; otherwise they will go elsewhere. Various photographs inaccurately show the entrance to Cirencester Park without the recent restrictions.	2.9 and 4.2 states that the town suffers from over-reliance on cars, and there is a perception that cars are unwelcome, but in reality cars are the main means of transport from neighbouring villages on which the town depends for much of its business. 2.16 states that the challenge is to provide long-stay parking at the periphery of the town, but this is inappropriate for people needing quick business access. 2.39 refers to reducing spaces given to vehicles for parking. A vibrant market town needs regular customers coming in for business; otherwise they will go elsewhere.
3 Preparing The Plan		Why has a small part of the SE of the town been omitted	
		This is a comment about Timescales as I cannot find any other category in which to post this. I was part of the group which produced the South Cerney Neighbourhood Plan. I urge you to get the Cirencester Neighbourhood Plan to the 'Made' Status as quickly as possible. Your 2026 projected date is too late. There will be a General Election before then, and potentially, changes to Planning Legislation. Capturing the views of the Community in this statutory form is essential. Whilst new Planning Legislation may continue to give some weight to community consultation, there may be a lot of rework required to recast your work into a different form. From my experience, one can spend a lot of time capturing and refining detail, but the crucial value comes from setting out core policies.	Recommends working to get CNP 'made' before next General Election as it would potentially bring changes to Planning Legislation.

		Its disappointing that there is so little awareness of this in the town. I am connected to a number of local groups. These groups have only recently become aware of this important document.	Comment about lack of awareness of the NP project.
		Coates Parish Council wishes to comment on section 3.2 where it says the purpose of preparing the Neighbourhood Plan was to add detail relevant to Cirencester, to Local Plan policies and propose new planning policy on issues that the Local Plan was silent on. There are three plans, the CNP, the local plan and the master plan, concurrently be prepared which affect the Cirencester. It is important that consistency is maintained between the plans.	Request to ensure consistency is maintained between NP, Local Plan and TCMP.
4 Aims & Objectives		4.13 Strongly support cutting light pollution by turning down many street lights.	
		Coates Parish Council has the following comment with respect to Aim/Objective 4.2 which gives a perception that cars are unwelcome, but in reality cars are the main means of transport from neighbouring villages on which the town depends for much of its business.	
5 Cirencester Town Centre	TC1 TC2 - Town Centre	Why can't the Market Place be one way NW to SE? There is no need for contra-traffic. Gosdich St could also be one way NtoS.	Suggests Market Place be one way NW to SE and Gosdich St one way N to S.
	TC1 TC2 - Town Centre	A purpose built medical centre in the Waterloo seems a sensible proposal - but it is a priority to replace the existing unsuitable surgeries in Town.	
	TC1 TC2 - Town Centre	If you want " green to the core" and you want multi storey carparks, why not out solar panels on the roof rather than sculptures?	5.6, 5.7 suggest solar panels on roof of any multi storey carparks rather than sculptures to further support "green to core"
	TC1 TC2 - Town Centre	I am unhappy with the suggestion to build multi story car parks.	Unhappy with multi-storey suggestion

	TC1 TC2 - Town Centre	As written, section 05 of the NCPÂ Â is hard to follow.Â Â CPC has following comments. Whilst improved public transport and pedestrian and cycle networks are to be commended, by pushing car parking out of the centre of town, the plan lacks any consideration of access for elderly and those with mobility issues who do not live in the centre of town, as well as other residents coming in from surrounding villages. Â The latter needs to be addressed in the CNP.Â Â The plan needs to be mindful that pushing parking to the edge of town along with the 20 minute neighbourhood plan has the potential to take away the heart of the town.Â Â The decked parking couldÂ Â be unsightly and not in-keeping with the historical town.Â Â More focus needs to beÂ Â given to affordable housing available for local people, both to purchase and rent across the across the age ranges of the local population. Creating a sense of enclosure to streets and spacesÂ Â needs careful consideration as, historically, it has the potential to segregate communities and encourage anti-social gatherings, particularly in the evenings.Â Â It is not clear how tourists visitingÂ Â the Amphitheatre, which is noted in the CNP as a 'key featureâ€™ would boost the local economy.Â Â It is more likely to cause congestion and ruin the local site.Â Â It is unclear how the infrastructure and improved public transport will be funded.	1) Need for balance between encouragement/enablement of active travel/public transport and needs of access for elderly and those with mobility issues / residents from outside centre of town and surrounding villages. Pushing carparks to edge of town lacks consideration for the latter. 2) Multi-storey suggestion unsightly and not in keeping with historical town. 3) More focus on affordable housing for local people. 4) balance to be struck between encouraging tourism at Amphitheatre and its protection. 5) Question about how infrastructure and improved local transport will be funded.
6 Access & Movement	AM1 - Spoke & Wheel	Coates Parish Council has the following comments on section 06Â Â Access & Movement: Whilst the improvement of public transport,Â Â pedestrian and cycle networks is to be commended, motivating the public to use such services may be an issue and, by implication, running the bus service may not be a profitable proposition for a provider. By pushing car parking out of the centre of town,Â the plan lacks any consideration of access for elderly and those with mobility issues who do not live in the centre of town as well as for those residents from surrounding villages whose only access is by car. The latter needs to be addressed in the CNP. The decked car parking could be unsightly and not in keeping with the character of the town. CNP states Kemble station is not fully utilised because of poor bus service connection and no safe at-grade cycle routes.Â Â Is there evidence to support this statement?Â Â It could be that the Kemble station is being fully utilised, but the train users are using private cars to reach the station.Â Â The point then is that car use needs to reduced to safe guard the environment and reduce congestion for the residents of Kemble.	CNP Table 1 states Kemble station is not fully utilised because of poor bus service connection and no safe at-grade cycle routes. Is there evidence to support this statement? It could be that the Kemble station is being fully utilised, but the train users are using private cars to reach the station. The point then is that car use needs to reduced to safe guard the environment and reduce congestion for the residents of Kemble.

	AM1 - Spoke & Wheel	Action on buses - enormous submission to be saved as a word document	New bus routes and stops should be planned for and built as part of any new development.
	AM1 - Spoke & Wheel	Fine as far as it goes. But it doesn't help a cyclist from Chesterton to Town Centre. The footpath from Apsley Road (School entrance) to Somerford Road should allow cycles.	Fine as far as it goes. But it doesn't help a cyclist from Chesterton to Town Centre. The footpath from Apsley Road (School entrance) to Somerford Road should allow cycles.
	AM1 - Spoke & Wheel	Will you really get a route across the park. Especially now that entrance fees are going to be charged.	Can't get the proposed route across Ciren Park due to new entrance fees.
	AM1 - Spoke & Wheel	There are some very good ideas here	
	AM1 - Spoke & Wheel	It should be noted that the existing footpath between the Harebushes and Bowling Green is only a permissive path and runs on private land.	It should be noted that the existing footpath between the Harebushes and Bowling Green is only a permissive path and runs on private land.
	AM1 - Spoke & Wheel	Cycling and walking needs to be embedded in all new developments and all parts of the town should be connected to a safe network of paths that link to retail, educational, health and employment areas. Parts of the town are cut off by the ring road and this creates difficulty for people to move around without using their cars.	All parts of town should be connected to safe network of paths linking retail, educational, health and employment areas. Overcome barrier of ring road for active travel. Cycling and walking needs to be embedded in all new developments.
	AM1 - Spoke & Wheel	Please reference and support South Cerney Neighbourhood Plan (which is a Made Plan) cf: Paragraph 2.4.2 "Whilst National cycle route 45 runs along the disused railway line through Cerney Wick and South Cerney, there is no â€˜off-roadâ€™ cycling route to Cirencester, or to Kemble Railway Station. The most direct route is a busy, largely unlit, minor road, which many residents regard as unsafe, leaving them with no option other than travelling by car." Policy SC15 Sustainable Travel and Rights of Way Network: "Redevelopment of a new off-road cycle link towards Cirencester and a cycle path to the Duke of Gloucester Barracks and the Cotswold Water Park". The Gloucestershire County Council Transport Plan aspires to improve this but without any firm commitment to budget and timescales.	Request NP references para 2.4.2 of 'made' South Cerney NP and Policy SC15 in relation to safe out of town cycle routes linking Kemble Railway Station and Cotswold Water Park to Cirencester. Currently improvements are an aspiration for GCC Transport Plan but without commitment to budget or timescales.

	AM1 - Spoke & Wheel	Any plan to improve cycling in Cirencester should be applauded. For cycling to be successful there needs to be a number of requirements - it needs to be safe, it needs to be a network and support facilities eg sheds need to be available. Within Cirencester that is, of course, extremely difficult, but it is possible within all of the many green spaces and some of the major roads. I lived and cycled in Copenhagen for many years and it's possible!	Suggests that for cycling to be successful, needs to be network with support facilities eg sheds.
	AM2 - Town & Country Connections	Coates Parish Council has the following comment. Care needs to be taken regarding the safety of pedestrians when routes are mixed ie for cyclists and pedestrians	Shared pedestrian cycle routes need to incorporate safety measures
	AM2 - Town & Country Connections	Will the light Rail scheme actually be built? In case not, and until it is, an hourly Cirencester to Kemble Station to Tetbury bus service is essential and it must connect with the train timetable - easy to achieve.	Suggest need for Cirencester to Kemble Station to Tetbury bus service connecting with train timetable if light rail scheme is not going ahead.
	AM2 - Town & Country Connections	Excited if some of these things actually come to pass. This is all very aspirational. Some good ideas. and the links into the countryside on existing rights of way could be much better signed. I think you could have made more of existing rights of way which we are very fortunate to have. They don't seem to be mentioned in the plan. Not very fair to say the routee up the church beyond N Cerney is "blocked" - there are lots of other rights of way. What we need are safer ways of getting out of the town to access them. I am very opposed to the Bathurst estate charging a Â£10 "deposit" to enter the park from mid-March 2024. This is retrograde and will discourage visits especially when locals have visitors - which presumably will incur further charges. Very bad for the Health Agenda. We are very fortunate that the Chester Masters allow walking in Hare Bushes but these are not rights of way and should not be taken for granted.	Existing rights of way, could be better signposted. Comment that wording in Table 1 re North up the Churn route regarding being blocked is unfair.
	AM2 - Town & Country Connections	See my comments on AM1 re referencing and supporting specifics in the South Cerney Neighbourhood Plan.	
	AM2 - Town & Country Connections	You need to include speed limits on major roads that pass residential areas	Recommend speed limits on major roads that pass through residential areas.

	AM2 - Town & Country Connections	I am happy with this, especially creating a walking/cycling route from the town to Kemble Station.	
	AM3 - Pedestrian Experience	As long as (i) does not hinder locals going about their daily activities. (h) could be supported by the Very Light Rail which could act as an effective park and ride fromits proposed carpark opposite the RAU	Ensure AM3i doesn't hinder locals going about their daily activities. AM3h could be supported by very light rail with park and ride.
	AM3 - Pedestrian Experience	Happy, but short term parking must be in the town centre. Long term parking can moved to the edge of town e.g. The Beeches Car park	Short term parking must be in town centre. LT parking can be moved to edge of town eg Beeches Car Park
	AM3 - Pedestrian Experience	Support moving long term, not short term, parking towards the peripery of the town	
	AM3 - Pedestrian Experience	Coates Parish Council have the following comment: By pushing car parking out of the centre of town, the plan lacks consideration of access for the elderly and those with mobility issues who do not live in the centre of town, as well as for those residents coming from neighbouring villages who only access is by car. The decked car parking could be unsightly and not in keeping with the character of the town. Widening footways could reduce carriageway width and potentially exacerbate traffic flow problems	AM3b widening footways could reduce carriageway width and potentially exacerbate traffic clow problems - need to manage to avoid conflict of purpose.
	AM3 - Pedestrian Experience	Need to keep central parking around a pedestrianised central area for tourists, shoppers and visitors, but with workers parking re-located to the periphery. Pedestrianised central area needs dedicated speed limited cycle lanes. Some trees in pedestrianised market place please.	AM3f pushing car parking out of the centre of town, access for elderly and those with mobility issues, need to keep central parking around a pedestrianised central area for tourists, shopppers and visitors, workers parking re-located to the periphery.
	AM4 - Integrated Mobility Hub	The current bus service is bad. Timetables (see AMZ re connection to Kemble) are often non-existent, illegible or out -of-date. Buses are dirty. Large double deckers are used on inner town services (50 and 58)	Exclude double decker buses from inner town centre

	AM4 - Integrated Mobility Hub	Yes an IMH is vital but its positioning is almost impossible. Forum car park is the logical answer but then where do you park?	Support but if replacing large car park (Forum) need alternative parking for elderly in particular. Also consider people parking at Beeches CP and catching National Express Buses on London Road Stop.
	AM4 - Integrated Mobility Hub	This is a brilliant idea. But alternative parking to replace Forum CP will be needed for the elderly in particular. (I don't mean disabled, just getting on a bit and unable to carry all the shopping home} Also, think of people parking cars at Beeches CP and catching National Express Buses.	Forum CP suggested for IMH
	AM4 - Integrated Mobility Hub	Would like to see this at the Old Station Carpark. Although it is noted that National Express would continue to use the London Road stop.	Old Station Carpark suggested for IMH
	AM4 - Integrated Mobility Hub	An Integrated Mobility Hub should be supported by dedicated bus lanes or bus gates to speed up travel times for buses. One of the central car parks should be transformed into a bus station to accommodate public transport options.	Suggest dedicated bus lanes to support IMH by speeding up bus travel times.
	AM4 - Integrated Mobility Hub	Yes! Especially integrated timetables for Kemble train station and bus services.	
	AM4 - Integrated Mobility Hub	The old station is a natural place for the mobility hub that has good and short access route to a dual carriageway, is suitable for long wheel base vehciles, is within the town centre, is a short walking distance to the Church, and connects with Cirencester's rich heritage.	
	AM4 - Integrated Mobility Hub	Coates Parish Council have the following comment with regard to the absence of a drop-off facility for coaches and the proposed IMH, a coach park could destroy the natural character of the town, as in the case of Bourton on the Water.	Concern that coach park would destroy natural character of the town.

	AM4 - Integrated Mobility Hub	Happy, but it is my view, irrespective of whatever economic or passenger number surveys have been carried out, the Kemble railway shuttle will never be economic and will not happen. A transport link to Kemble is laudable however. This should be an electric bus service, possible on a dedicated bus lane, if feasible and economic. The challenges and risks of an electric bus connection tied to the transport hub seem minor compared to the major operational/economic risks of a light railway.	
	AM5 - Strategic Connections & Transport Links	Re-emphasise need for decent Cirencester - Kemble - Tetbury bus service. New trains up and down arrive / dep at 1X40/45 it should b e easy to achieve.	
	AM5 - Strategic Connections & Transport Links	We desperately need a transport hub which local buses and national express coaches can access easily.	
	AM5 - Strategic Connections & Transport Links	The provision of the Very Light Rail would greatly enhance the connectivity to the National mainline network	
	AM5 - Strategic Connections & Transport Links	Coates Parish Council has the following comment. Whilst the improvement of public transport, pedestrian and cycle networks is to be commended, motivating the public to use such services may be an issue and, by implication, running the services may not be a profitable proposition for a provider. CNP States that Kemble Station is not fully utilised because of poor bus service connection and no safe at-grade cycle routes. Is there evidence to support this statement? It could be that Kemble station is being fully utilised, but the train users are using private cars to reach the station. The point then is that car use needs to be reduced to safe guard the environment and reduce congestion for residents of Kemble.	
	AM5 - Strategic Connections & Transport Links	Happy, but see previous regarding Kemble Light Railway.	

7 Design & Built Environment	DBE1 - Design Quality	Why no inclusion of the spectacular views of the church tower when viewed from the Burford Road/ Hare Bushes perspective? The field there is popular with dog walkers from the surrounding estates to the north of the town and the open views would be ruined by any development on that land (currently part of Abbey Home Farm, I believe).	Suggest inclusion of view of the church tower from Burford Road/Hare Hushes.
	DBE1 - Design Quality	Coates Parish Council has the following comment: Creating a sense of enclosure to streets and spaces needs careful consideration as, historically, it has the potential to segregate communities and encourage anti-social gatherings, particularly in the evenings	
	DBE2 - Protection of Landscape & Townscape Views	See Harebush views comments in DBE1	
	DBE3 - Conversion of Existing Properties	Coates Parish Council commends the conversion of unused upper floors of commercial buildings in Cirencester to residential use. Generally, more focus needs to be given to housing available to local people, both to purchase and rent, across the age ranges of the local population.	
	DBE4 - Protection of NDHAs	The ideals are fine -its maintaining these principles that is always difficult and seem to be ignored in practice.	
	DBE4 - Protection of NDHAs	Should the Band Stand in the Abbey Grounds be a Non-Designated Heritage Asset? I can't find it on Historic England as a Listed Structure. It is distinctive and represents part of our social history.	Suggests inclusion of Band Stand in Abbey Grounds as a NDHA
	DBE4 - Protection of NDHAs	I really like this.	
	DBE4 - Protection of NDHAs	this is an important policy to protect the rich heritage of Cirencester	

	DBE5 - Net-Zero & Energy Efficiency Measures in the Design & Construction Process	Obsession with net zero energy efficiency should not blind the fact that windows need to open to allow fresh air into buildings for health benefits.	
	DBE5 - Net-Zero & Energy Efficiency Measures in the Design & Construction Process	Electrical vehicle charging points are very important as there is a shortage of safely located, publicly available ones in the area, which, for me is a significant barrier to moving to an electric car	Would like to see more publicly available, safely located, EV chargers.
	DBE7 - Homes in Multiple Occupation	Again ideals are excellent - but need to be stressed in planning.	
8 Quality Public Realm	QPR1 - Illuminated Signage	No digital billboards should be allowed in the town or vicinity, as residents cannot choose to ignore these when they are placed in the street.	Recommend no digital billboards in town
	QPR2 - Quality Steets & Spaces	Signs - particularly road signs must be cleaned regularly. Many are a disgrace.	Maintain and clean road signs
	QPR2 - Quality Steets & Spaces	The historic centre of the town should not allow through traffic especially when there is a purpose built two lane dual carriageway which offers a bypass around the centre. This would protect the centre of the town and reduce the level of traffic.	Ban through traffic in historic centre of town.
	QPR4 - Heritage Trails and Wayfinding Systems	Creating riverside walks through the town would be attractive to residents and visitors.	
	QPR4 - Heritage Trails and Wayfinding Systems	We don't want too many overlapping different ones as this is confusing.	

9 The 20 Minute Neighbourhood	TMN1 - 20 Minute Neighbourhoods	I fully endorse the policy.	
	TMN1 - 20 Minute Neighbourhoods	A good principle. But every household has a unique 20 minute neighbourhood. A bit misleading to put all those circles on the map, making it look as if you were in one or another, not your own unique one. I'm not sure it really applies to small market towns, more to cities. Very interesting ideas in supporting information.	Suggests cirle map is misleading and confusing.
	TMN1 - 20 Minute Neighbourhoods	Currently, on our street, most traffic is ignoring the 20 mph advisory speed limit- often going faster than 30mph. 20 mph is essential but will it be enforced?	
	TMN1 - 20 Minute Neighbourhoods	Worried by proposal to extend all ring road roundabouts to 3 lanes because of new housing estate. The Tesco 3 lane roundabout is daunting & confusing which prevents some older drivers attempting to use it. Living in Abbey Estate we always walk to town by various routes. Many times we are overtaken by silent cyclists who make no allowance for where we might walk & how we donâ€™t hear them coming. Shared routes might need separation lanes & reminders to think of safety of walkers. Visitors to town will enjoy pedestrian spaces& roads but there must be good parking around this area â€¦& long stay placesâ€¦& low costs to boost businesses. markets etc. More seats & toilets open for longer would encourage people to walk.	
	TMN1 - 20 Minute Neighbourhoods	Increasing direct, safe walking and cycling connections are important to the town and the viability of the town centre. The dual carriageways, with national 70mph speed limit, create barriers within the town. The proposed crossings do not create new restrictions for vehicles because they are all located at roundabouts where vehicles are already required to stop. Many people consider subways unsafe and bridges significantly increase the distance pedestrians and cyclists must travel.	
	TMN1 - 20 Minute Neighbourhoods	Provided the 20 minute rule is seen as GUIDANCE only and is not rigid, Coates Parish Council is generally supportive, but care must be taken not to take away the hear of Cirencester's town centre	

10 The Natural Environment	NE1 - Biodiversity Net Gain	This is excellent.	
	NE1 - Biodiversity Net Gain	Important that the 10% biodiversity net gain is within, not outside, the town boundary.	
	NE2 - Rewilding Schemes	Always a good idea but rewilding becomes neglect and messy!! Prefer ordered control!	
	NE2 - Rewilding Schemes	To be encouraged	
	NE3 - Wildlife Corridors	Fully support this policy	
	NE3 - Wildlife Corridors	Why is the County Council trying to charge people for replanting the Highway trees? These are part of wildlife corridors. Too many have been cut down and not replaced.	
	NE3 - Wildlife Corridors	There are additional corridors and green spaces that should also be recognised and I point you to the comments submitted by the Cirencester Wildlife Group on this policy.	
	NE4 - Green & Blue Infrastructure Protection & Enhancement	Developers donâ€™t always deliver on their promises.	
	NE4 - Green & Blue Infrastructure Protection & Enhancement	Most of the policy and the supporting information in this section of the plan make sense. I would like to see reference made to Building with Nature standards as a way of securing good quality green infrastructure in new developments though, as this is a benchmark of what good GI should look like and is accessible to everyone. It incorporates specific standards for wildlife and biodiversity.	Make reference to Building with Nature standards as a way of securing good quality green infrastructure in new developments as benchmark of what good GI should look like, with specific standards for wildlife and biodiversity.
	NE5 - Flood Mitigation	No more building on the flood plain.	No building on flood plain

	NE5 - Flood Mitigation	I think the Policy needs to be strengthened, given past experience of flooding and projections of the impact of climate change. Developers should prove that their developments cannot make the situation worse, and, should contribute to reduction in risk and improvement of flood mitigation measures. Passing the problem further downstream cannot be an acceptable solution.	Strengthen Policy NE5 to require developers to prove their developments cannot make the situation worse and that they will contribute to reduction in risk and improvement of flood mitigation measures.
	NE5 - Flood Mitigation	Huge problems in Cirencester from flooding & sewage surcharging because old & inadequate sewage systems & treatment centres. Any improvements depend on Thames Water financial decisions. Our property is regularly affected in Winter & after heavy rain by polluting sewage flowing out of manholes into road drains.	
	NE5 - Flood Mitigation	Please see additional comments in Cirencester Wildlife Group's response.	
	NE6 - Local Green Space Designations	In the list of local green spaces, No. 42 St John Baptist Churchyard - why is there not tick under tranquility and wildlife?	Suggest No. 42 St John Baptist Churchyard -has tick under tranquility and wildlife
	NE6 - Local Green Space Designations	What happens if developers fail to keep promises & find â€œ legalâ€• ways to avoid keeping to local planning requests.	
	NE6 - Local Green Space Designations	Please see additional specific comments and recommendations in Cirencester Wildlife Group's response to this policy.	
	NE6 - Local Green Space Designations	this is important particularly as the largest green space within the town is about to start charging for access.	
	NE6 - Local Green Space Designations	As public access to Cirencester Park is now restricted, Coates Parish Council question whether it still be described as a Local Green Space with access enjoyed by residents and visitors	Question validity of Ciren Park as LGS given it is now restricted access.
	NE7 - Green Gaps	Is there really any power to stop these losses. How can a buffer zone be compensated for if it is removed?! These green spaces around the town are key to Ciren character & atmosphere making it so different to other historic towns encircled in suburbs.	

	NE7 - Green Gaps	Please see Cirencester Wildlife Group's comments on this section as well. I support and endorse the comments made by this group as I am Chairperson.	
	NE7 - Green Gaps	the mitigation is not sufficient, the green gaps should be retained	Mitigation is not sufficient - green gaps should be retained.
	NE7 - Green Gaps	Green gaps between Cirencester and adjoining settlements should be retained .	
	NE7 - Green Gaps	Coates Parish Council is supportive. As highlighted in sections 10.70-10.74, it is important that adjacent settlements preserve their distinct identity and urban sprawl is prevented.	
11 The Local Economy	LE1 - Protect & Enhance Economic Activity	Continuing to hold Markets (eg Friday market, Farmers' Markets) should be encouraged. As well as drawing tourism and trade, they are valuable places for social interaction, making shopping pleasurable, rather than purely transactional. I generally buy more in such environments than I would either online or in supermarkets and shops. The balance between branches of shops which are part of chains and one-off independent shops is important. A factor in people visiting the town (as tourists or from the local area) is being able to visit a shop/cafe etc which is a one-off or different from the standard high streets.	
	LE1 - Protect & Enhance Economic Activity	Coates Parish Council has the following comment. Whilst agreeing with the policy statement, the proposed plan should be wary of keeping all local traffic out of the town as the economy of the town centres has declined in recent years. The 20 minute neighbour plan has the potential to be detrimental to business in the centre of town. Given the location of the amphitheatre It is not clear how tourists visiting the amphitheatre, would boost the economy of the local economy. It is more likely to cause congestion and ruin the site.	Proposed plan should be wary of keeping all local traffic out of town and potential of 20MNH to do same as could be detrimental to business in centre of town.
12 Wellbeing & Community	WBC1 - Air Quality	Improved liaison with Police to enforce vehicle drivers to switch off petrol / diesel engines when parked in town or near schools would be beneficial especially taxi/private hire vehicle drivers.	
	WBC1 - Air Quality	Good	

	WBC1 - Air Quality	Air quality monitoring, including oxides and particulates, should be measured across the whole town. Without this the town cannot expect to be able to maintain and improve air quality.	Air quality monitoring, including oxides and particulates, should be measured across the whole town
	WBC3 - Equal Access to Green Spaces For All	All good aims	
	WBC3 - Equal Access to Green Spaces For All	Mixed feelings - Unfortunately free access to Cirencester Park will no longer be possible for all after Mid March 2024. This is very very sad and not good for the Health Agenda. The Plan has some very good ideas for other green spaces.	
	WBC4 - Access to Play Spaces	Good	
	WBC5 - Community Facilities	Coates Parish Council wishes to emphasise the importance of parking for primary health care facilities, as most residents from surrounding villages can only access these by car.	
	WBC6 - Designing Out Crime	Good ideas here	
	WBC8 - Noise Pollution	I'm not sure what the status of the projects in Appendix 2 is - there are lots of good ideas some of which I prefer to others.	
	WBC8 - Noise Pollution	Don't with cars being encouraged out of the town centre at night. For example, many people would want access by car for safety reasons. Has the introduction of a 20mph speed limit and the market place design reduced noise pollution? Would reducing speed limits on the dual carriagewys reduce nosie pollution?	
	WBC8 - Noise Pollution	Discouraging cars from entering the town centre at night could increase the risk of harm to women and vulnerable people.	Discouraging cars from entering the town centre at night could increase the risk of harm to women and vulnerable people.

Responses from Members of the Public and Other Organisations – Sentiment Pie Charts

By close of the consultation period, there had been 930 contributions from members of the public and other organisations.

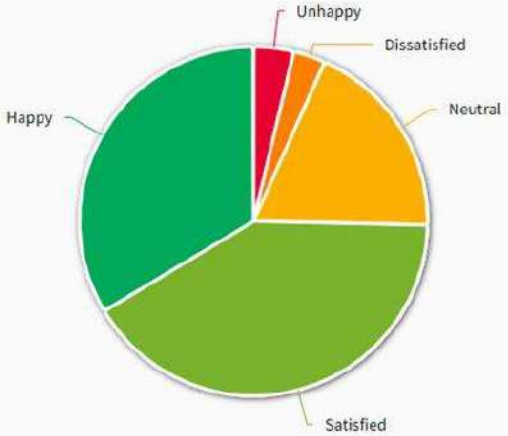


The following percentages are based on the number of contributions made to the consultation, not the total number of people who participated. Contributions were primarily made by people who live in Cirencester, work, or have a business.

Age Profile:	**Employment Status:**
4% 35-44	1% Carer
6% 45-54	1% Student
35% 55-64	2% Town Councillor
32% 65-74	2% Retired Part-Time
20% 75-84	2% Part Time Employment
3% 85+	3% Self-Employed
	8% Steering Group Volunteer
	15% Full Time Employment
	66% Retired

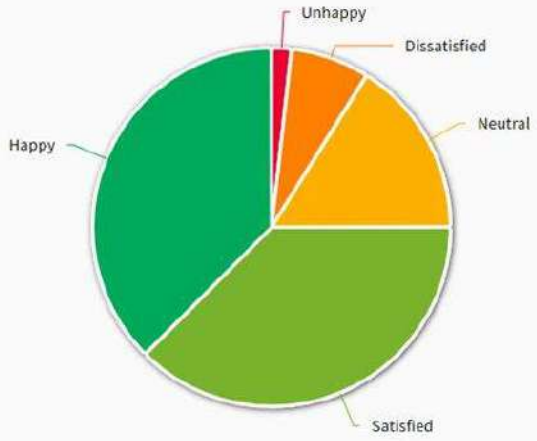
126 respondents provided further details about their gender and identity; this provides a more accurate idea of the total number of people who participated in the consultation. 44% male, 40% female, 16% did not say, no-one identified as being transgender. 75% identified as white British, 4% identified as either white Irish, white British African or white British European, 3% identified as white-other. 9% identified as having a long-term illness or mobility impairment.16% only use their car as the usual method of travel in the area, 15% walk/cycle/jog, 65% use a combination including car and walking. 11% also use the bus and train.

Vision – Pie Chart and Word Cloud – How do you feel about the vision?





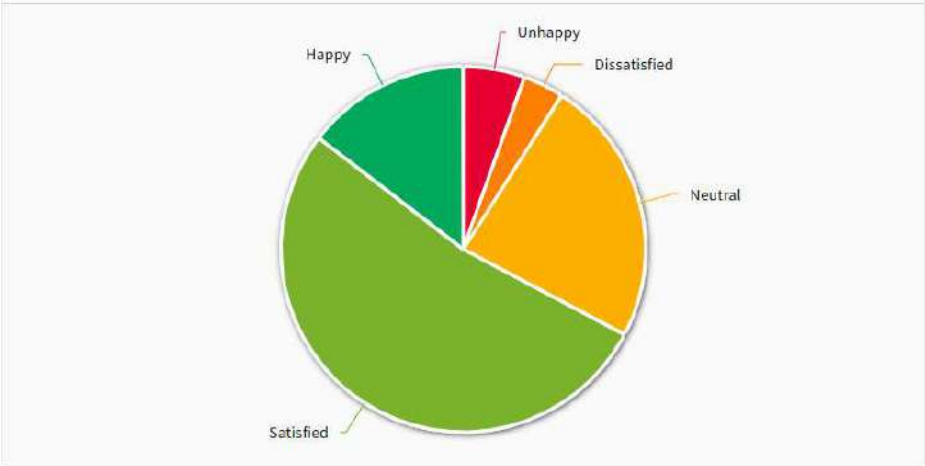
Aims and Objectives – Pie Chart and Word Cloud – How do you feel about the set of aims and objectives?



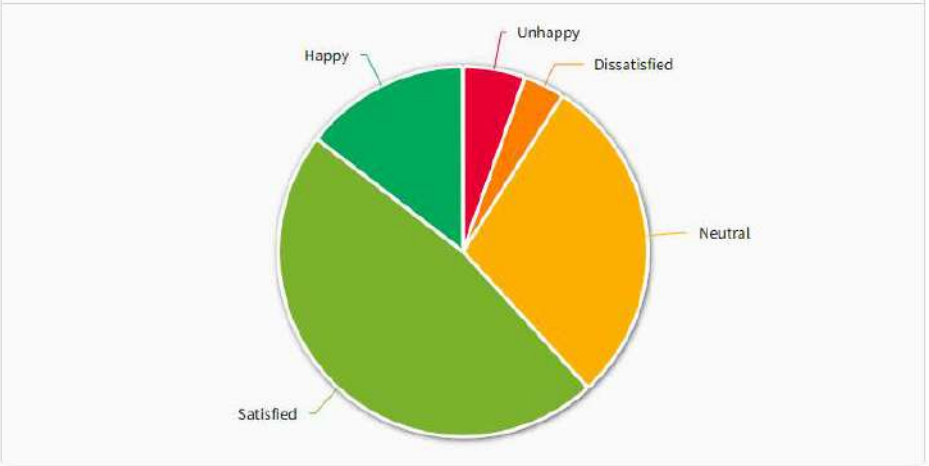


Cirencester Town Centre – Pie Chart – Policy TC1 and TC2

TC1 – General Development

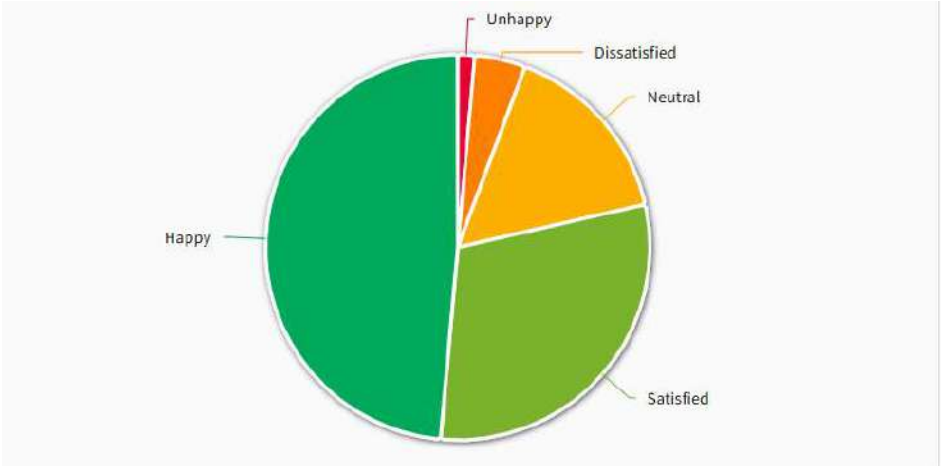


TC2 – Areas of Change



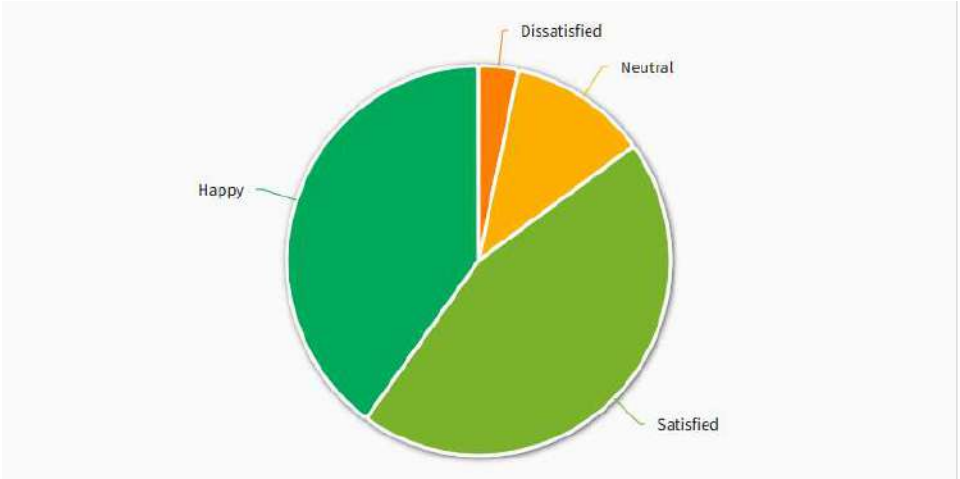
Access and Movement – Pie Charts and Word Cloud

AM1 – Spoke and Wheel Cycle Network



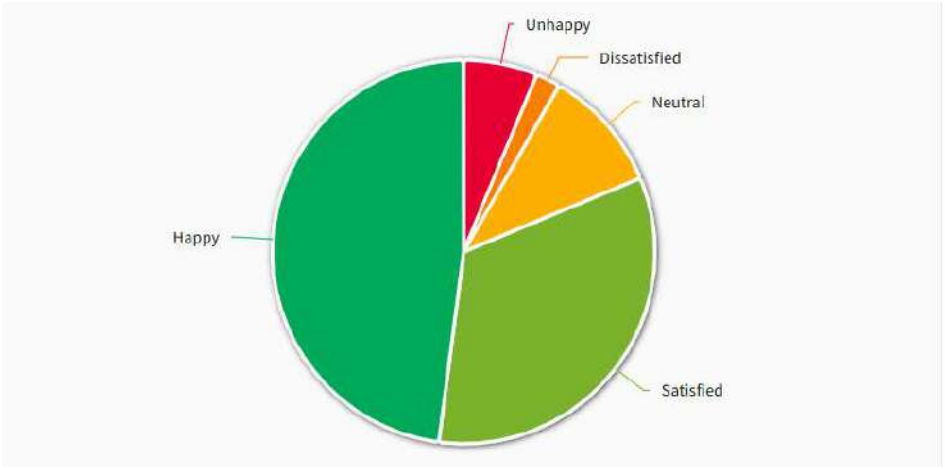


AM2 – Town and Country Connections



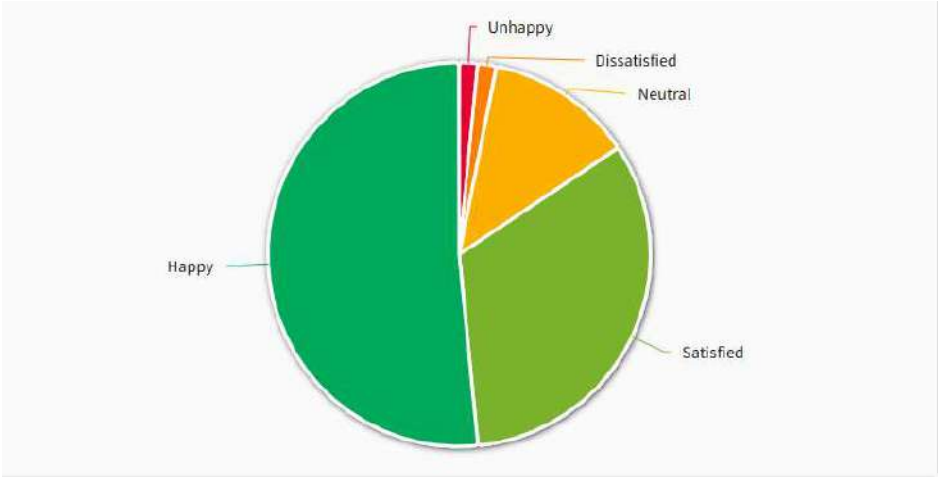


AM3 – The Pedestrian Experience



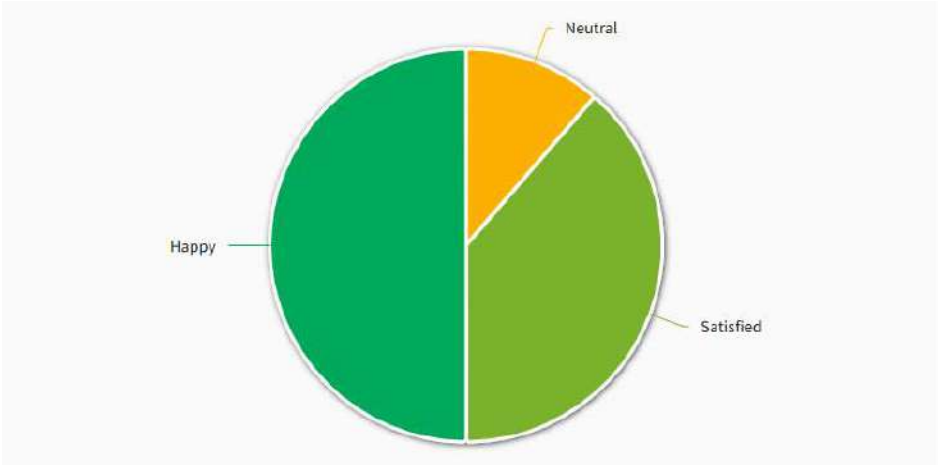


AM4 – Integrated Mobility Hub





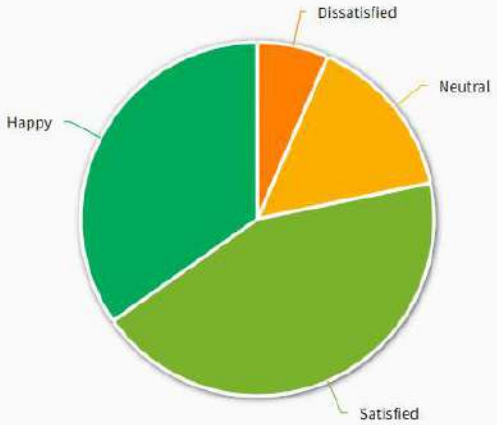
AM5 – Strategic Connections and Transport Links

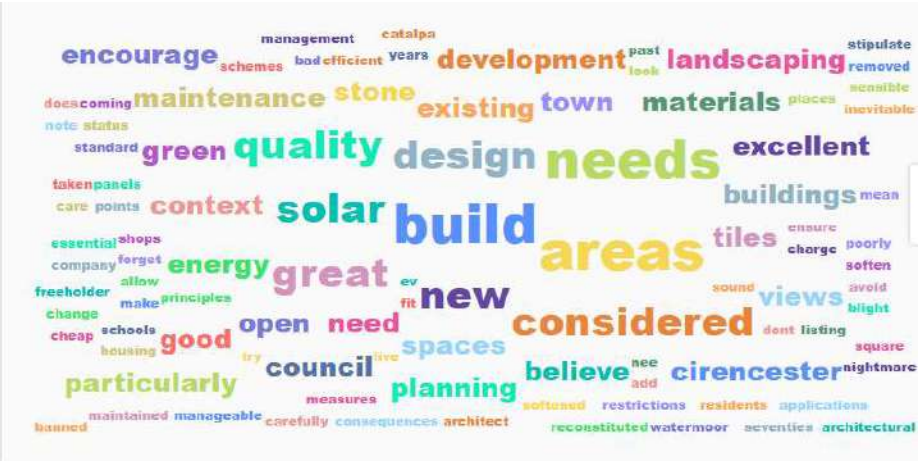




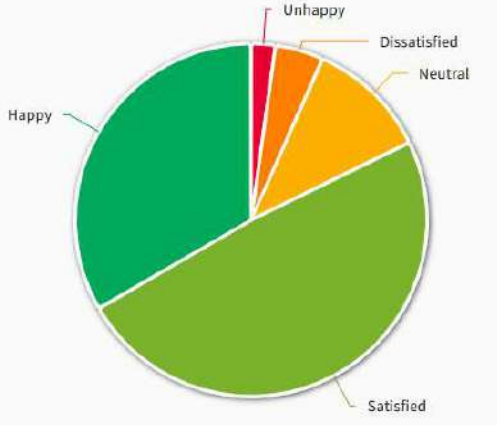
Design and Built Environment – Pie Charts and Word Clouds

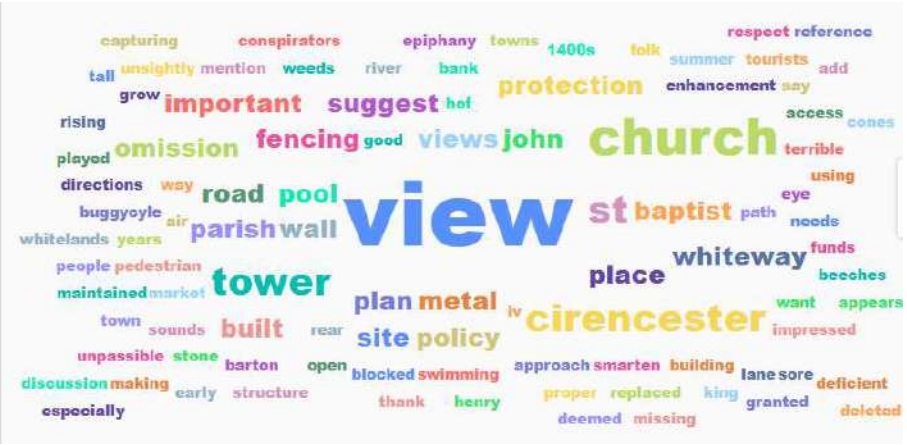
DB1 – Design Quality



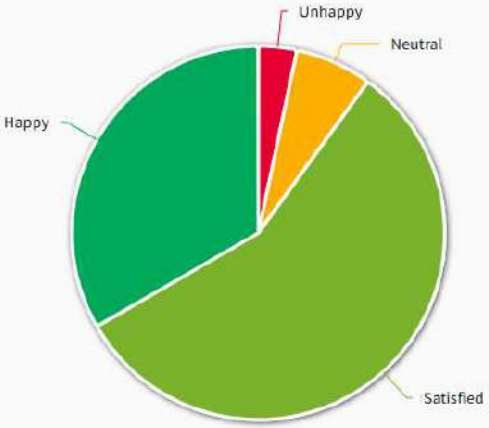


DB2 – Protection of Landscape and Townscape Views



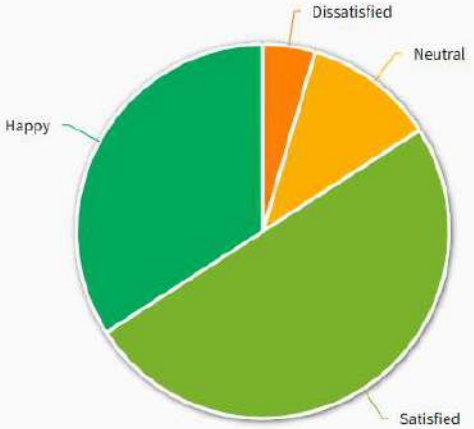


DB3 – Conversion of Existing Properties



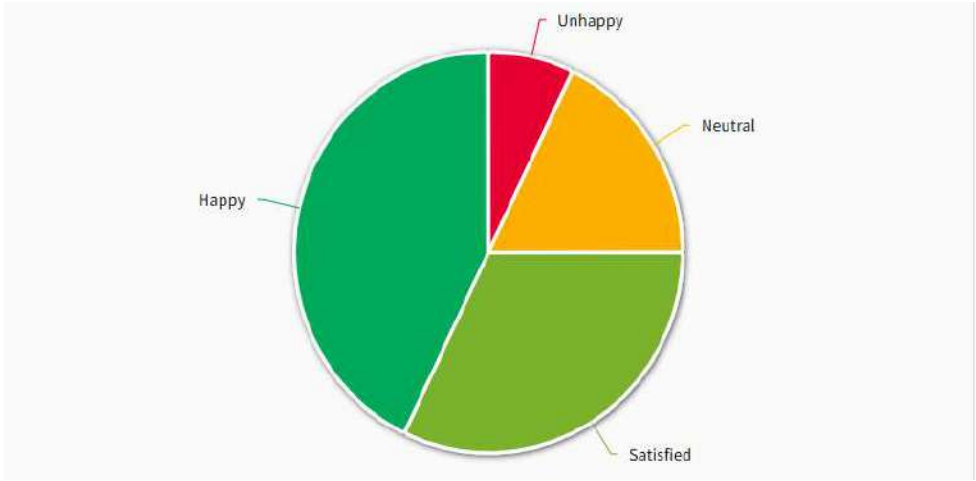


DB4 – Protection of Non-Designated Heritage Assets



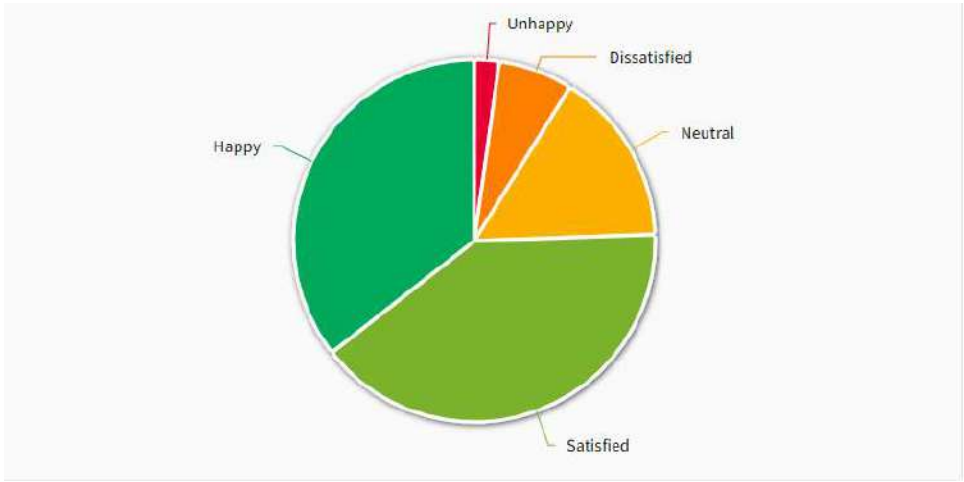


DB5 – Net Zero and Energy Efficiency Measures in the Design and Construction Process



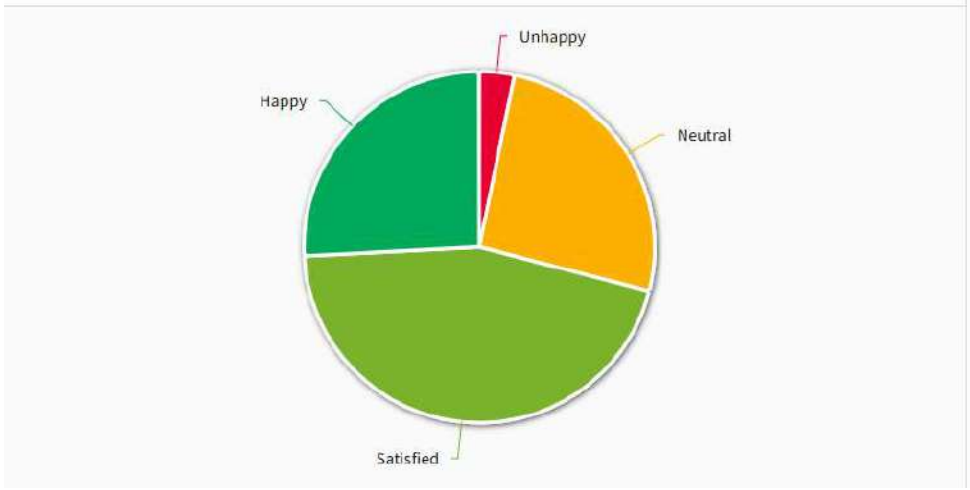


DB6 – Energy Use in New Buildings





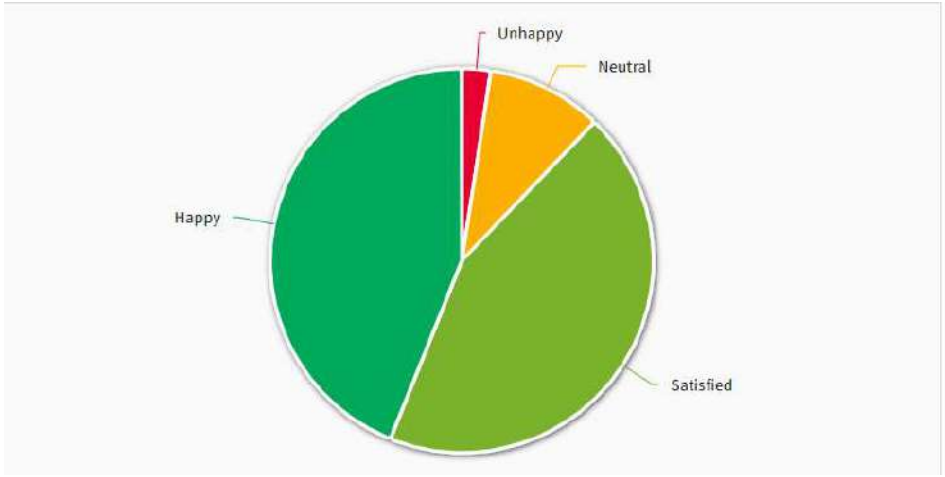
DB7 – Homes in Multiple Occupation





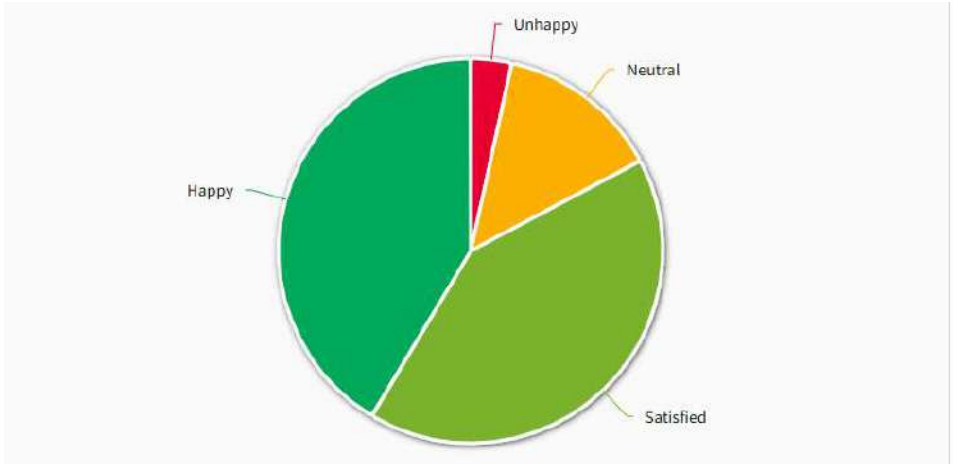
Quality Public Realm – Pie Charts and Word Clouds

QPR1 – Illuminated Signage



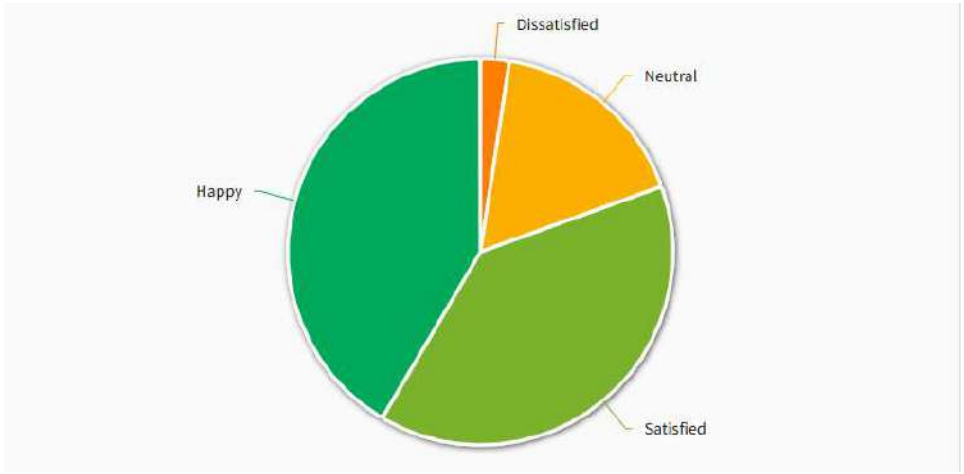


QPR2 – Quality Streets and Spaces



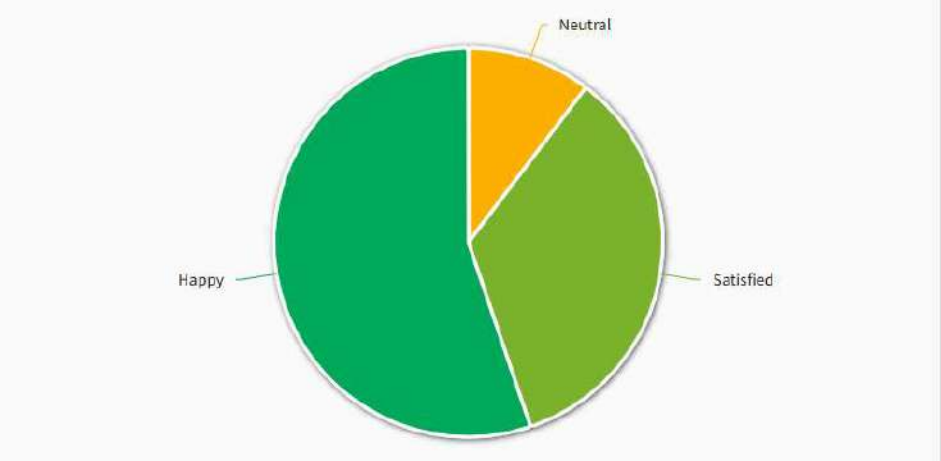


QPR3 – Social and Civic Spaces



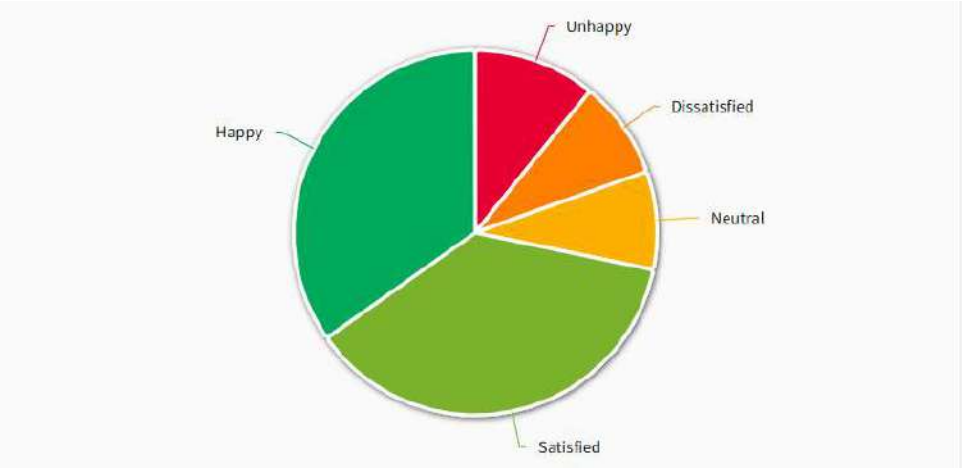


QPR4 – Heritage Trails and Wayfinding Systems





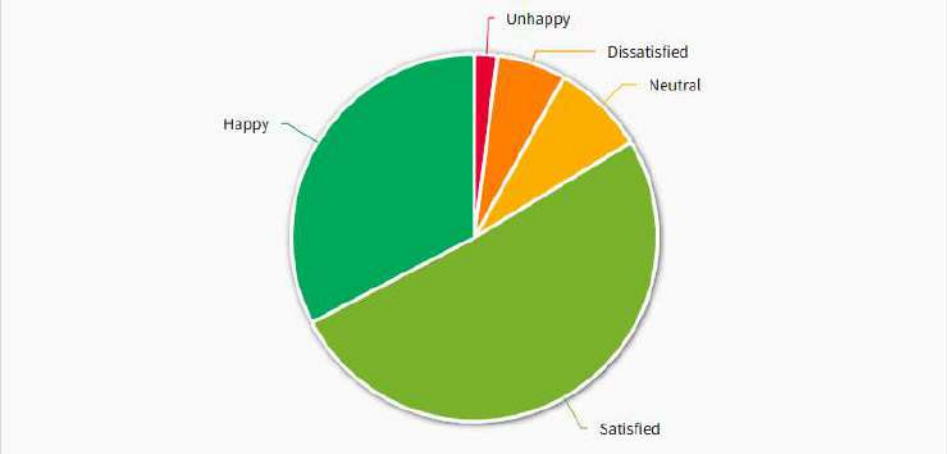
The 20 Minute Neighbourhood – Pie Chart and Word Cloud – How do you feel about this policy?





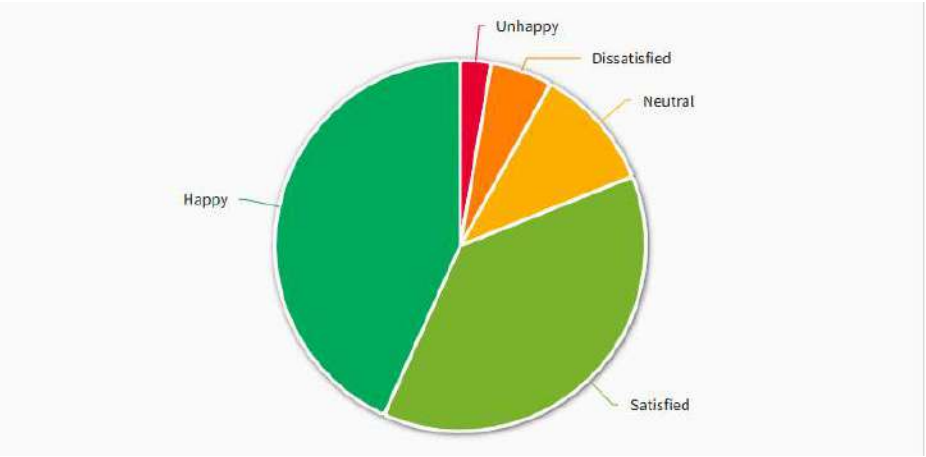
The Natural Environment – Pie Charts and Word Clouds

NE1 – Biodiversity Net Gain



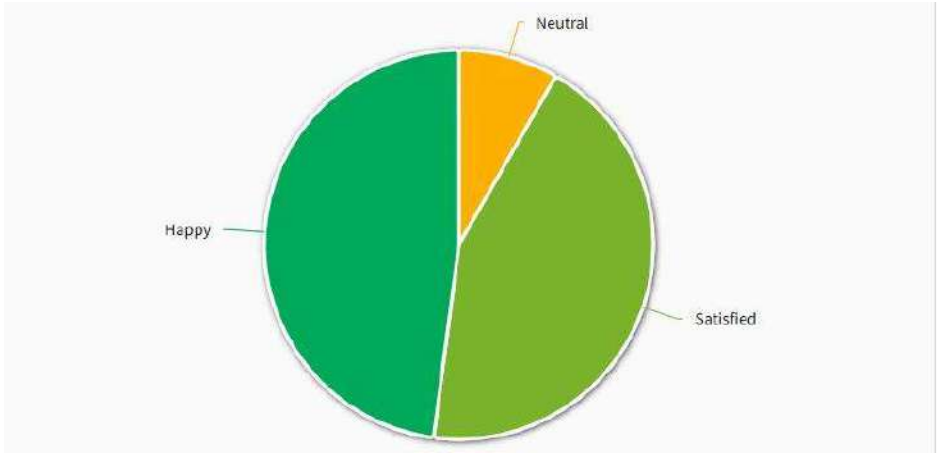


NE2 – Rewilding Schemes



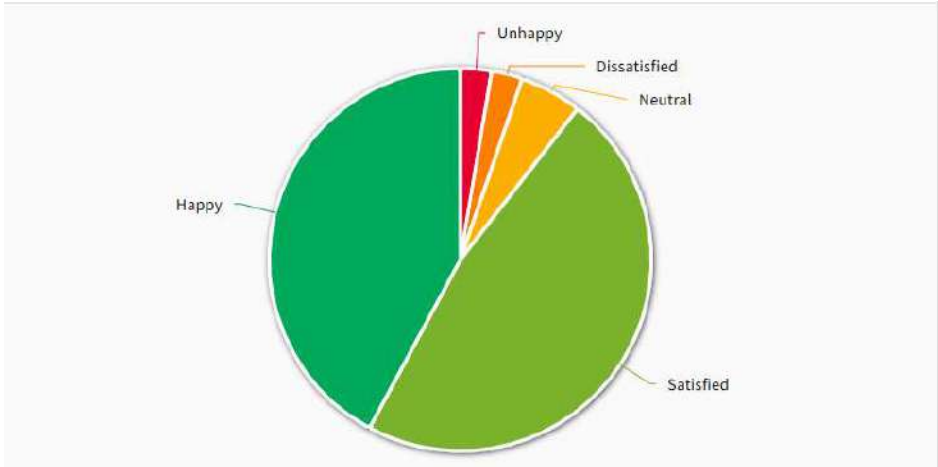


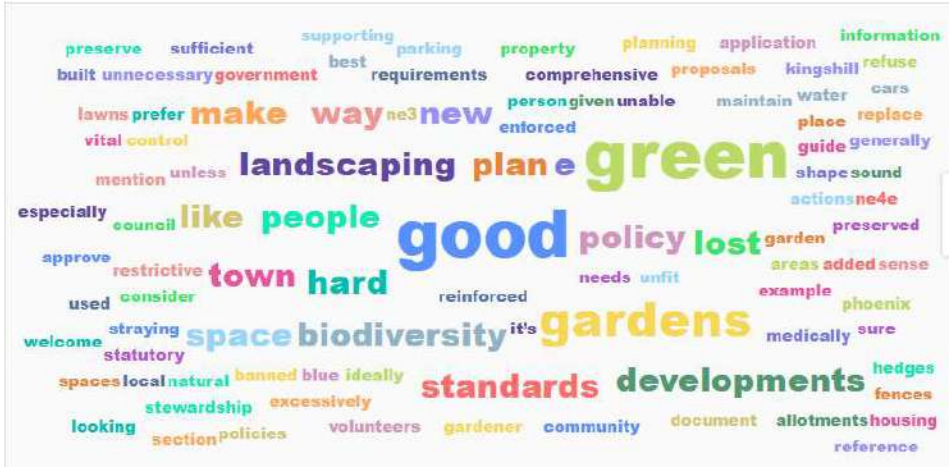
NE3 – Wildlife Corridors



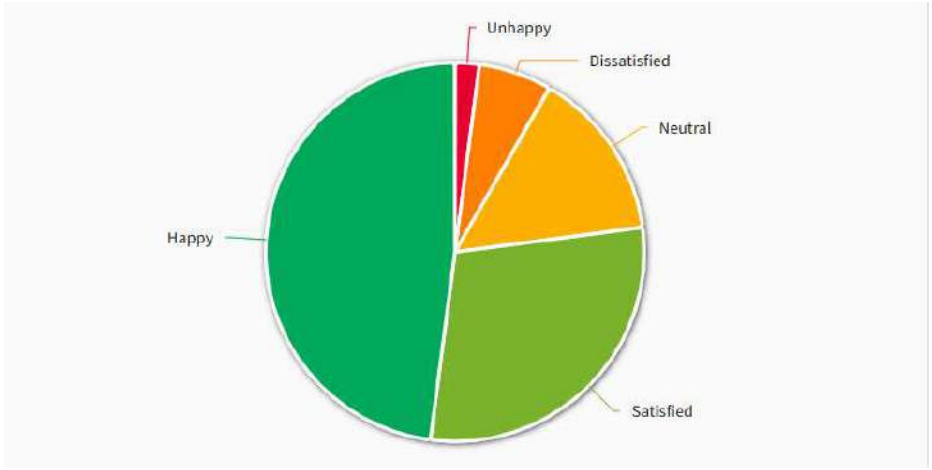


NE4 – Green and Blue Infrastructure Protection and Enhancement



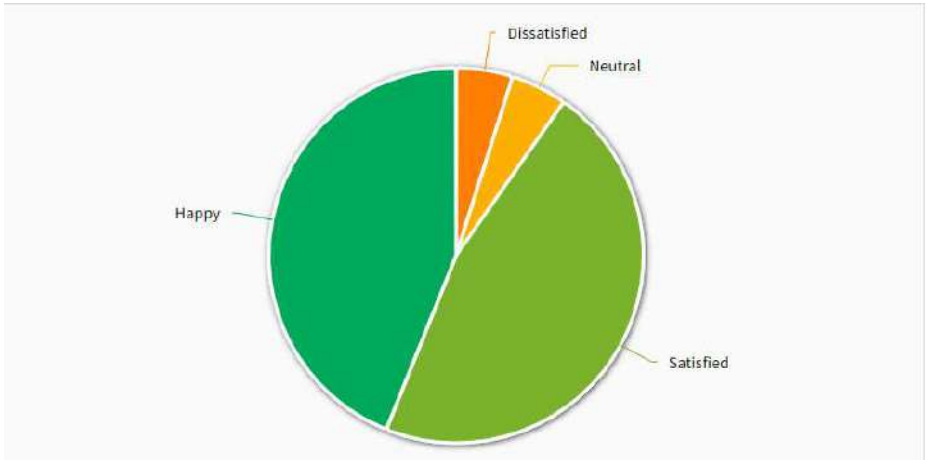


NE5 – Flood Mitigation



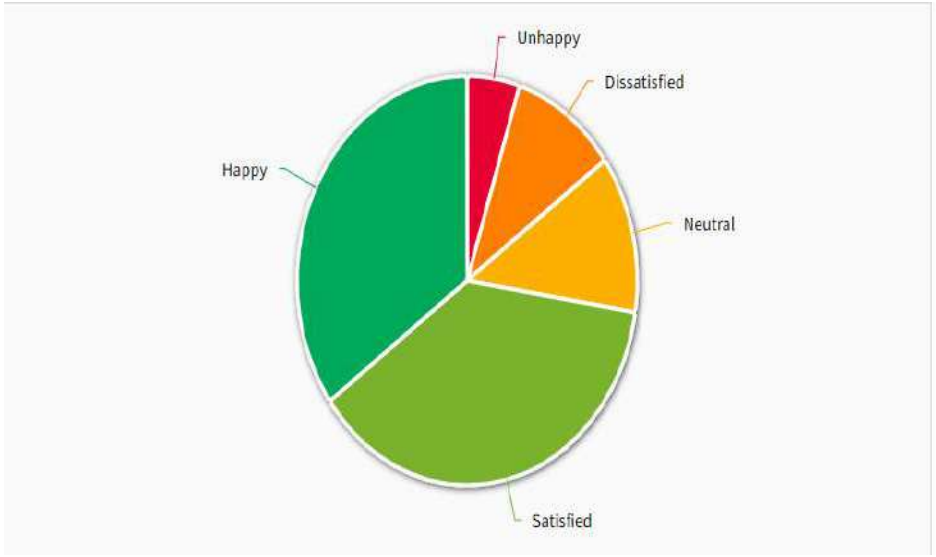


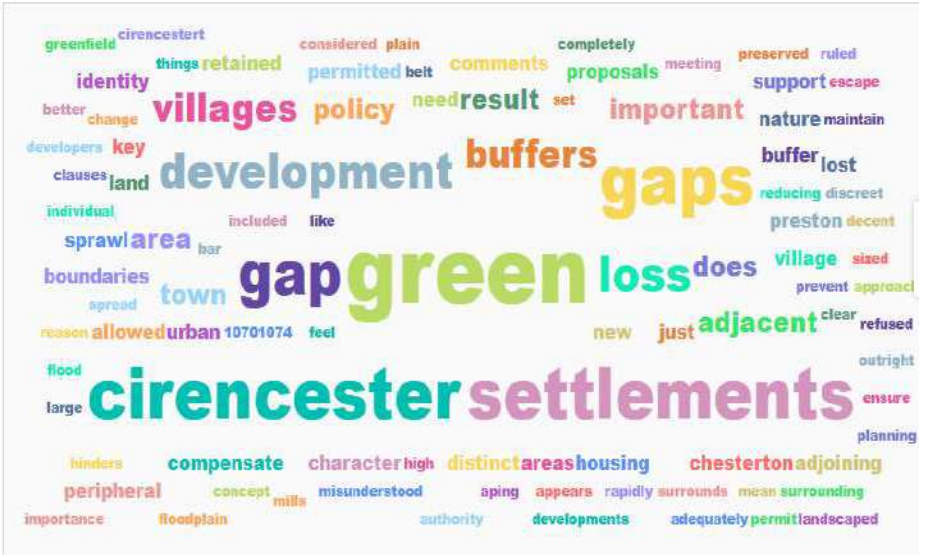
NE6 – Local Green Space Designations





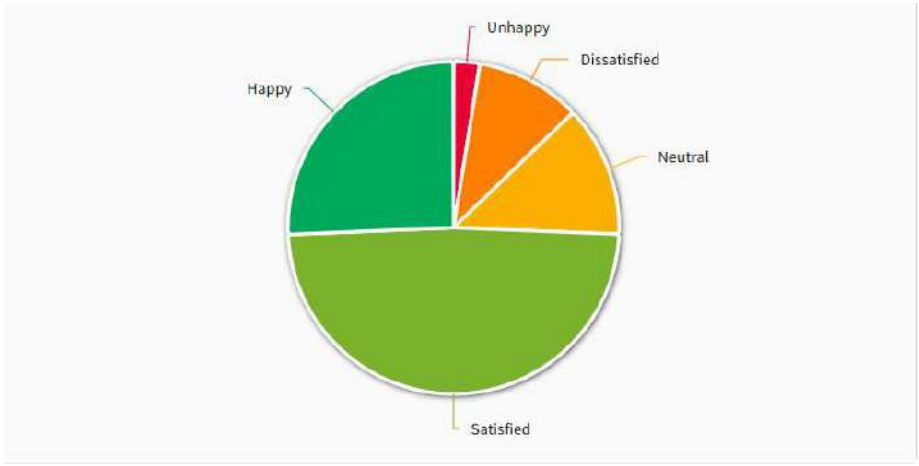
NE7 – Green Gaps





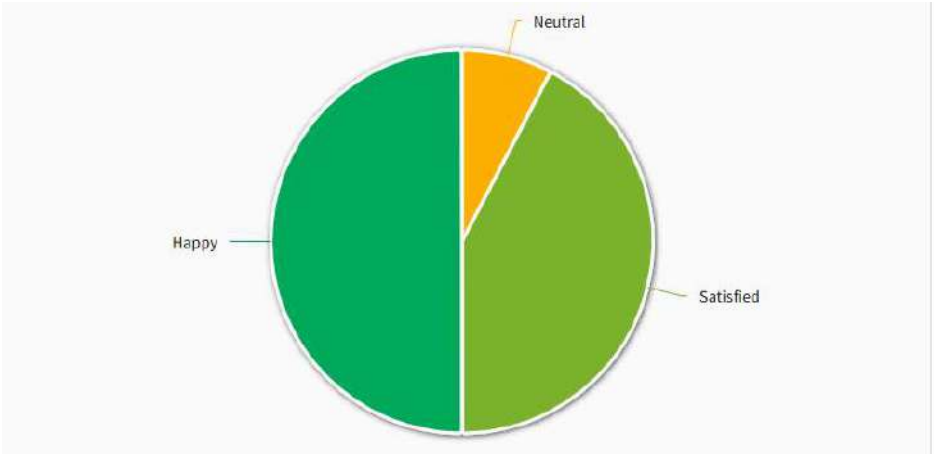
The Local Economy – Pie Charts and Word Clouds

LE1 – Protect and Enhance Economic Activity



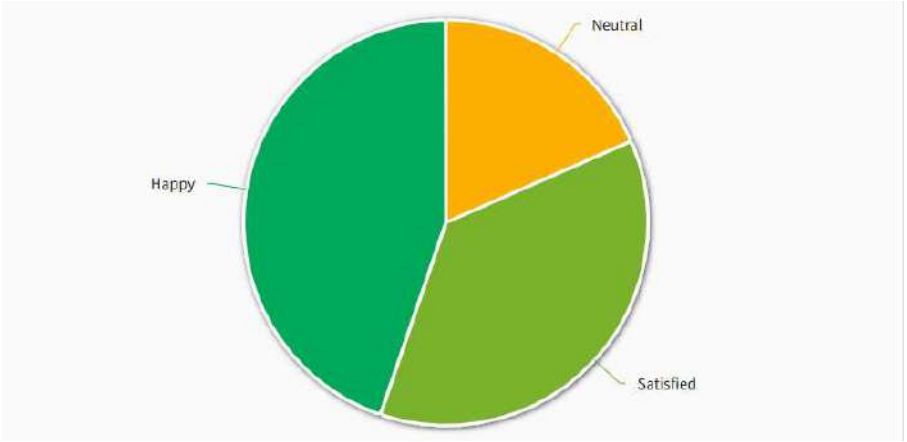


LE2 – Provision for Innovative Work Spaces, New and Small Businesses



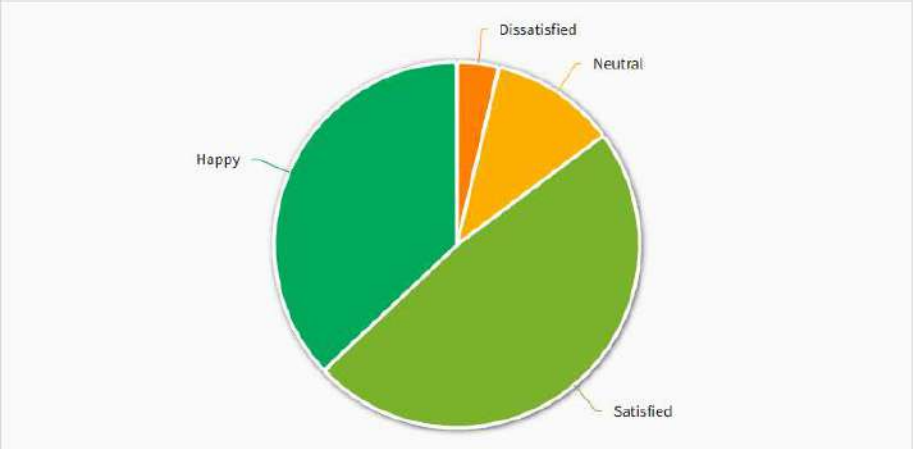


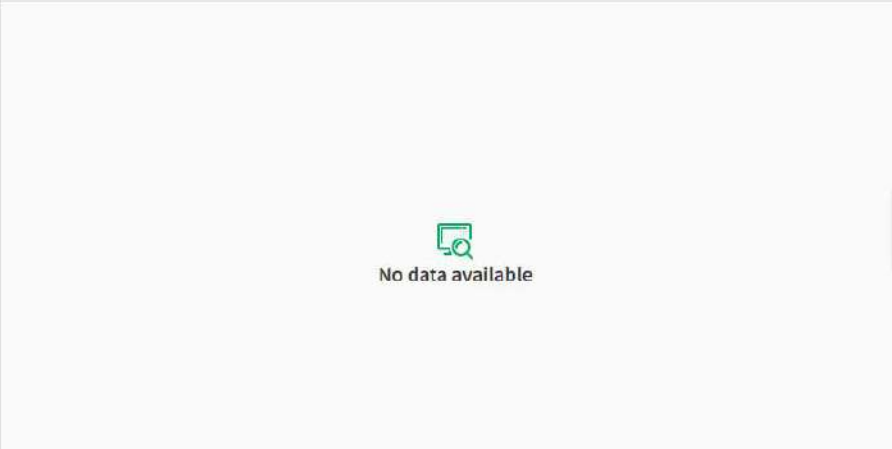
LE3 – Skills Development





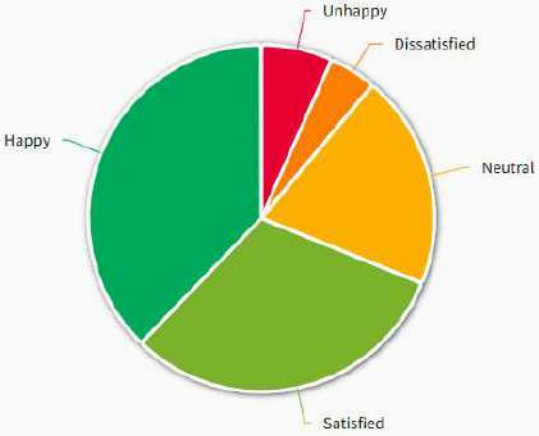
LE4 – New Employment Premises and Design Quality





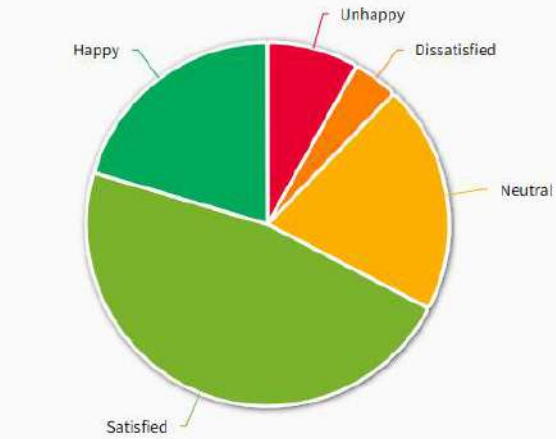
Wellbeing and Community – Pie Charts and Word Clouds

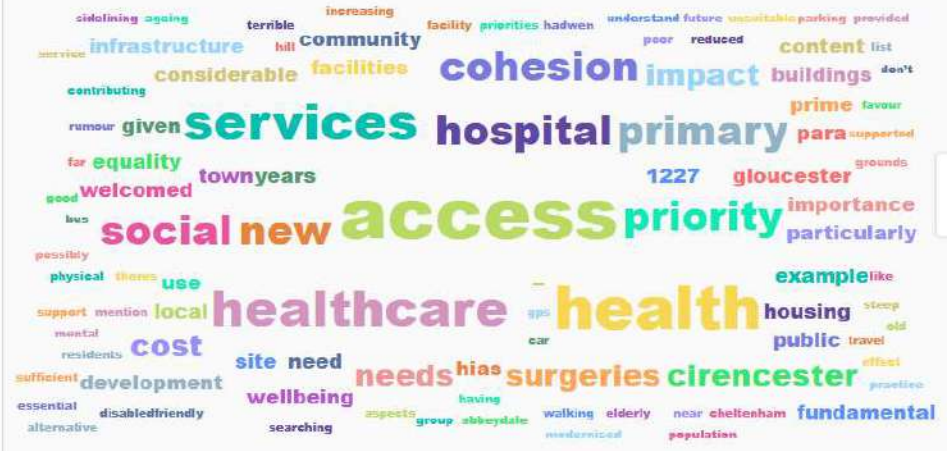
WBC1 – Air Quality



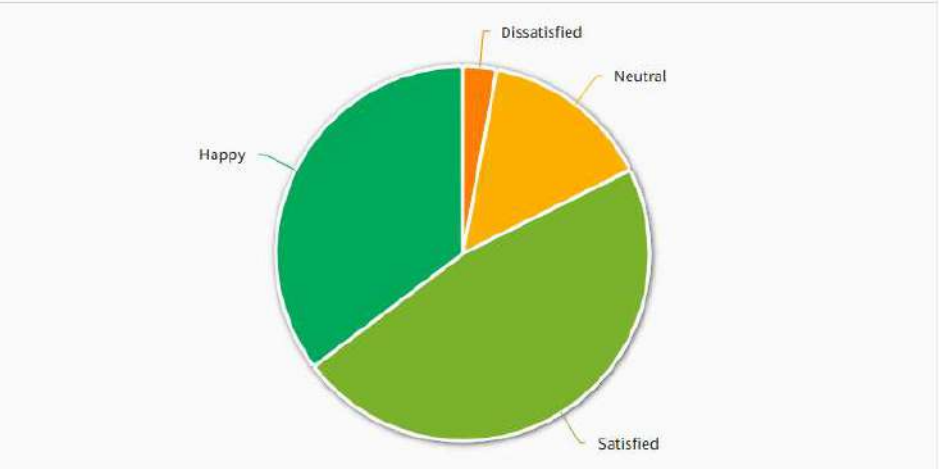


WBC2 – Health Impact Assessments



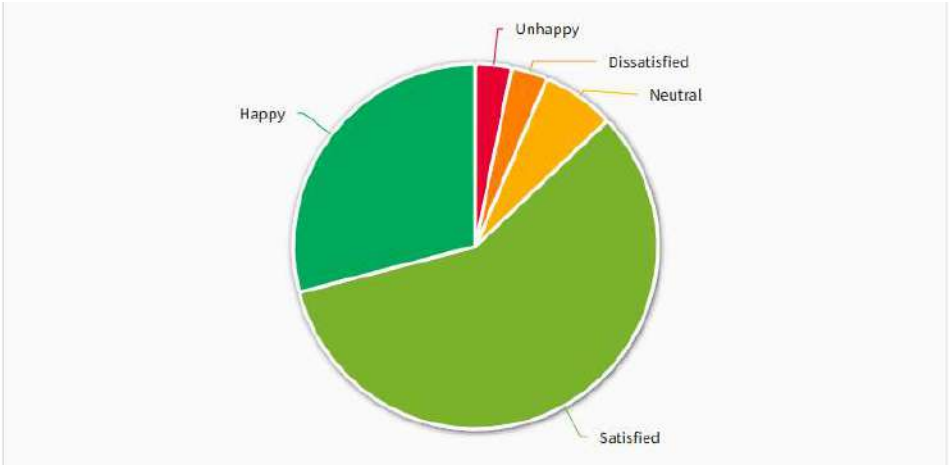


WBC3 – Equal Access to Green Spaces for All



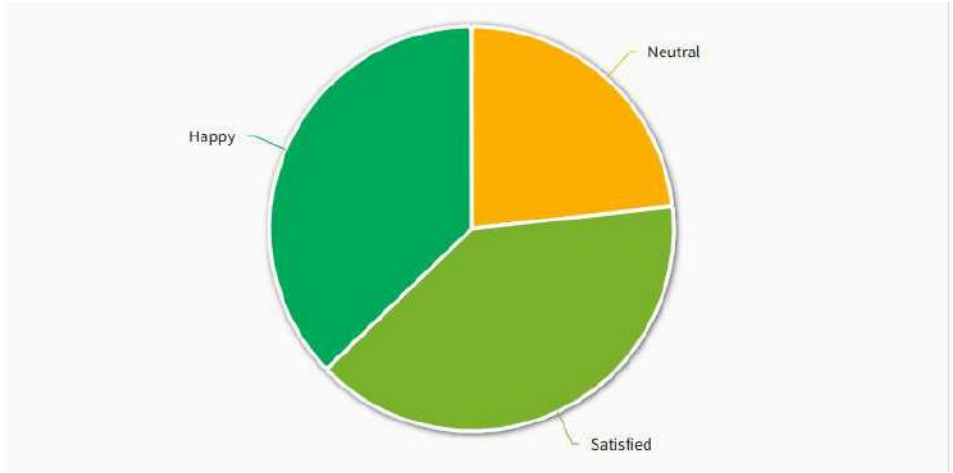


WBC4 – Access to Play Spaces



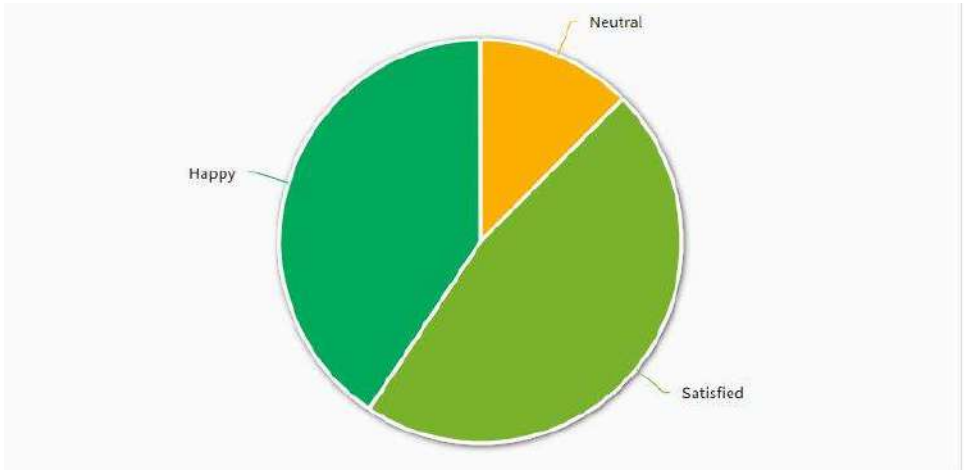


WBC5 – Community Facilities



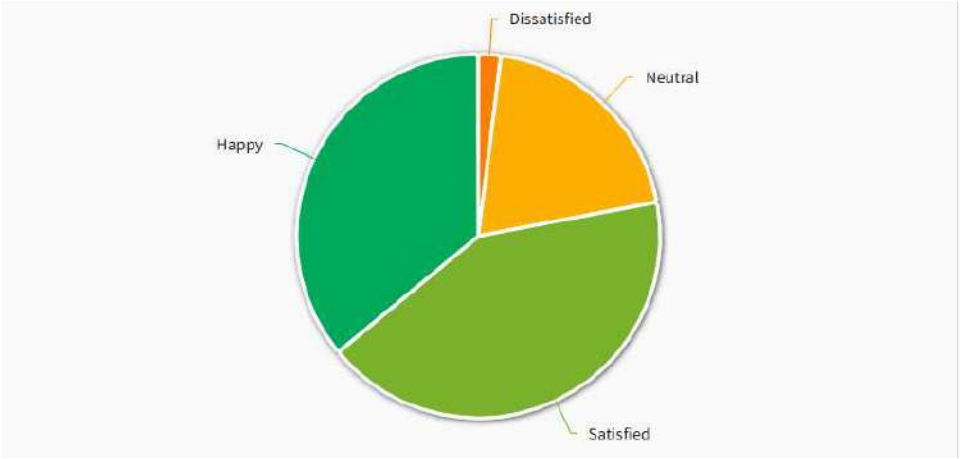


WBC6 – Designing out Crime



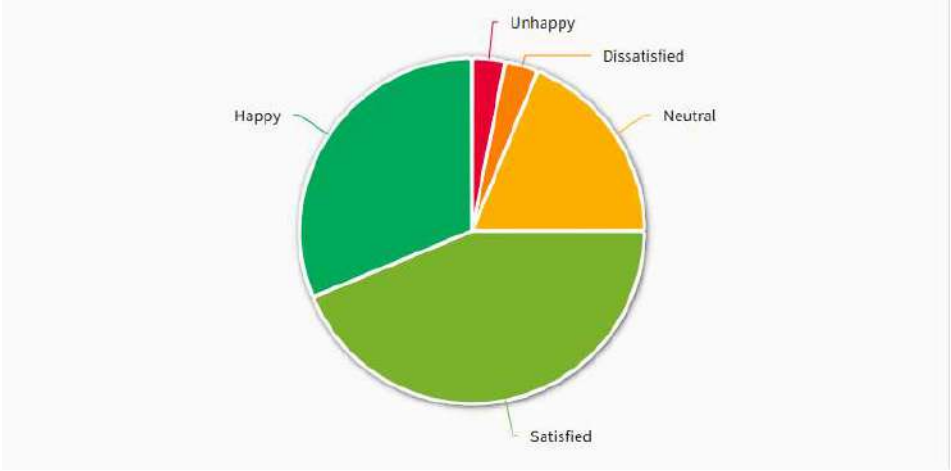


WBC7 – Light Pollution





WBC8 – Noise Pollution



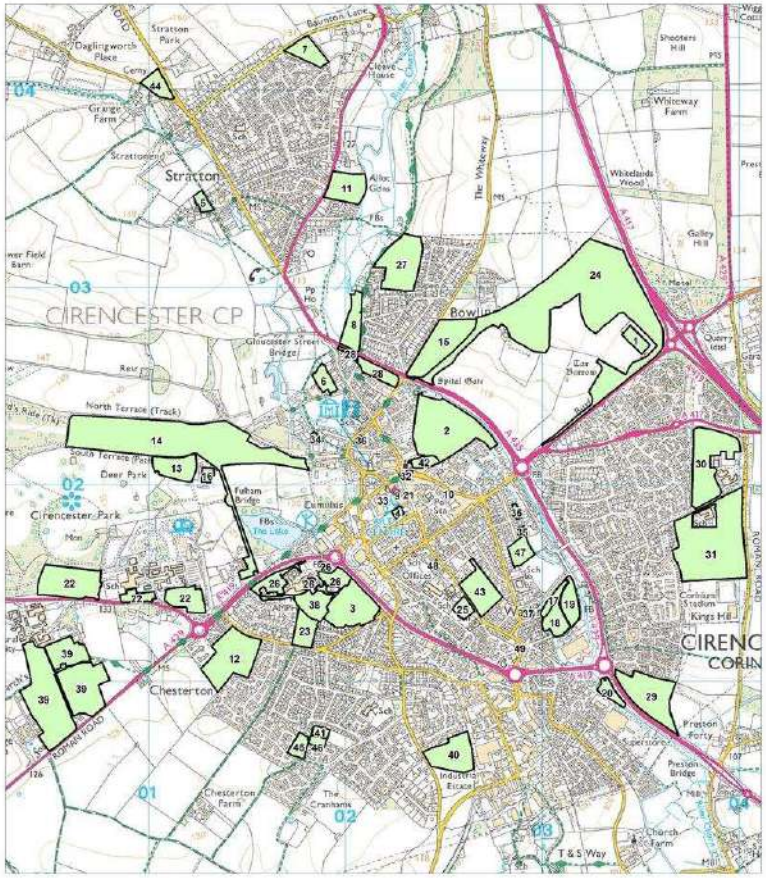


Local Green Space Designations

APPENDIX 03

LOCAL GREEN SPACES DESIGNATION

49 sites were identified by the Cirencester NDP Steering Group as worthy of consideration for designation within the Plan. 39 of those have been deemed not to meet criteria for designation in the Cirencester NDP, following consultation with Statutory Consultees. All 49 sites have been described and mapped below, with reasons given in the table opposite for non-designation in the Plan, on advice from Cotswold District Council.



Sites considered for designation within the Neighbourhood Plan

Reason for Non-designation as a Local Green Space	
	Proposed LGS Designation
	Already designated as a LGS within the Local Plan
	Already subject to strong constraints or protections
	LGS protections at this site could constrain future development of community benefit
	Site is not compliant with the NPPF

Number	Local Green Space Site	Reason	Number	Local Green Space Site	Reason
1	Abbey Farm Allotments Harebush		26	Hospital Grounds	
2	Abbey Grounds		27a	Humpty Dumps (Bowling Green Road)	
3	Amphitheatre		27b	Humpty Dumps (Bowling Green Lane / Ave)	
4	Ashcroft Road Bowls Club		28	Jack Gardner Memorial Garden	
5	Barn Way Allotments		29	Kingshill Country Park	
6	Barton Lane Allotments		30	Kingshill School Playing Fields	
7	Baunton Lane Playing Field		31	Kingshill Playing Field (Also known as Kingshill Sports Development)	
8	Bromford Allotments Bowling Green Lane		32	Market Place	
9	Brewery Court		33	Old Tesco Supermarket Seating Area	
10	Catalpa Square		34	Open Air Swimming Pool	
11	Cheltenham Road Allotments		35	Purley Road Allotments	
12	Chesterton Cemetery		36	Quaker Meeting House Quiet Garden	
13	Cirencester Cricket Club		37	Queen Street Allotment Gardens	
14	Cirencester Park and Old Kennels		38	Querns Wood	
15	Cirencester Rugby Club		39	Royal Agricultural University Playing Fields	
16	Cirencester Tennis Club		40	Somerford Road Allotments	
17	City Bank Allotments		41	Springfield Road Allotments	
18	City Bank Nature Reserve		42	St John's Churchyard	
19	City Bank Recreational Ground		43	St Michael's Park	
20	Cricklade Road Picnic Area		44	Stratton Cemetery	
21	Cricklade Street/West Way Seating		45	Thistle Park Chesterton Community Garden	
22	Deer Park Secondary School & Cirencester College Playing Fields		46	Two Acres and Land at Cranhams Lane	
23	Four Acre Field		47	Victoria Road Meadow	
24	Harebush Woods		48	Watermoor Road Cemetery	
25	Holy Trinity Churchyard Garden of Remembrance		49	Watermoor Road/Way Corner Seating	

1. ABBEY FARM ALLOTMENTS HAREBUSH



Accessed from London Road or through Harebush Woods, this site is owned and managed by the Chester-Masters.

2. ABBEY GROUNDS



Hidden behind the large parish church of St John Baptist, the Abbey Grounds is the site of St Mary's Abbey, demolished in 1539, and forms an informal, free public recreational facility of 8.44 hectares, incorporating the former Abbey's trout lake, the only remaining Abbey structure in the Norman Arch, a children's playground, a bandstand, remains of the roman wall and large areas of mown grass used for a variety of informal games and leisure activities. Extending to the River Churn it retains some of the 17th century landscaping. It is bordered by the A417 Grove Lane Bypass, the rear of the town's Market Place and the later residential housing off Dugdale road, with winding pathways and extensive views across the grounds, especially from east to west towards the parish church tower. Pedestrian access is from Gosditch St next to the church, through the Norman Arch from Grove Lane, via Corinium Gate or through the pay and display Abbey grounds car park on Dugdale Road.

3. AMPHITHEATRE



The open grounds, lake, wildfowl, trees and greenery form an impressive pastoral centrepiece, inviting restful contemplation of the general town scene. During August it hosts a free three day Phoenix music festival with other annual events such as the food and drink festival. Ownership is with Cirencester Town Council.Cirencester Amphitheatre stands on the site of a former limestone quarry, just outside what was the original roman wall, to the west of the town. It is now bordered by the A429 Bristol Rd bypass, the residential housing of Cotswold Avenue and Querns wood which sits within Cirencester hospital grounds. Built around the early 2nd century and one of the largest in Britain, today all that remains are the grassy mounds of its oval structure covering 5.2 hectares. Open to the public it is used as a thoroughfare by locals connecting Chesterton to the town centre, occasional historical events with the Ermine Street Guard and recreational use. The main entrance is Cotswold Avenue with information boards and limited parking. Ownership rests with Cirencester Town Council and English Heritage.

4. ASHCROFT ROAD BOWLS CLUB



Formed in 1930 the outdoor town lawn green bowls club is a private members club of 0.14 hectares located and accessed through the Brewery car park, well supported with league tournaments and a modern clubhouse with a licensed bar. Owned and managed by Cirencester Bowls Club.

5. BARN WAY ALLOTMENTS



Accessed from Barn Way, this site Of 0.59 hectares sits on the peripheral of the town and is owned and managed by the Bathurst estate.

6. BARTON LANE ALLOTMENTS



Barton Lane Allotments are situated to the west of Cirencester, close to the town centre, tucked to the north behind Gloucester Street. There are 41 plots managed over 0.92 hectares owned and managed by St John's Hospital and Other Almshouses Charity. The site is well hidden and many residents of Cirencester are unaware of its existence, often pleasantly surprised when they discover it for the first time.

7. BAUNTON LANE PLAYING FIELD



Full size football pitch and recently renovated children's playground with tunnels, slides and climbing frame, accessed off Baunton Lane. Also used for community gatherings and maintained by volunteers. Owned by Cirencester Town Council.

8. BROMFORD ALLOTMENTS BOWLING GREEN LANE



Accessed from Bowling Green Lane this site Of 2.14 hectares sits with the River Churn along its length and is owned and managed by the Chester-Masters.

9. BREWERY COURT



Pedestrian 0.08 hectare area of open space with seating, within the former location of an 18th century town Brewery, now the New Brewery Arts Crafts building which dominates the square. The area connects foot traffic from its boundary with Cricklade Street through to the Brewery Car park with several retail units within. Multiple private ownership.

10. CATALPA SQUARE



Demolition of several building in Dyer St during the 1960s and 70s created the area now known as Catalpa Square, 0.04 hectares in size and named after the four Catalpa trees planted within, now removed. Bordered by shops it serves mainly as a seating area dominated by the relocated Jubilee column of 1935. Privately leased.

11. CHELTENHAM ROAD ALLOTMENTS



Site of 2.63 hectares accessed from Cheltenham Rd on the peripheral of the Town in Stratton, owned and managed by St John's Hospital and Other Almshouses Charity.

12. CHESTERTON CEMETERY



Opened in 1871 and still in use as a burial ground, the site of 4.57 hectares is accessed from Chesterton Lane through the former neo-gothic keepers lodge gate with on road parking. The site contains many war graves and a former non-conformist chapel, now used for storage. Owned by Cotswold District Council.

13. CIRENCESTER CRICKET CLUB



Membership private cricket club with pitch and clubhouse formed in 1842. It is one of the oldest in the country, sitting within Cirencester Park, towards the education quarter, next to Cirencester Tennis Club and accessed by vehicle from Tetbury Road or on foot through the park from Cecily Hill. Well supported with matches and junior level coaching.

14. CIRENCESTER PARK AND OLD KENNELS



Cirencester Park as a whole, stands at the north-west edge of the town and covers over 1000ha in area, extending towards the parishes of Coates, Duntisbourne Rouce, Daglingworth and Sapperton. It lies on gently undulating land, bounded to the south by the A419, to the west by a minor road from the A419 to Winstone, and on the other sides by agricultural land.

An extensive wooded park divided by straight line avenues which define key viewpoints, it was established by Allen, first Earl Bathurst, from 1714 to 1775, with the help of Alexander Pope and much influenced by Bathurst's association with Stephen Switzer.

The Broad Ride, identified here, forms the central axis of the park. Privately owned the park is open to the public. A path connects Broad Ride with Old Kennels, redeveloped open land owned by the Bathurst Estate which now serves as an area of rewilding, car park and retail site with a footpath connecting the Education Quarter on the Tetbury Road roundabout through to Cirencester Park when open.

15. CIRENCESTER RUGBY CLUB



The current site of the Rugby Club sits on the fringes of the town, at the traffic lights on Grove Lane, with the Whiteway junction. It has existed here since 1953/4 using an old Nissen Hut as a clubhouse. Later additions formed the facilities now seen, including the spoils of the bypass to create and level up the pitches. A new car park was added in 2020 and today the club provides training for youth teams as well as professional fixtures. The site covers 4.86 hectares and is owned and managed by Cirencester Rugby Club.

16. CIRENCESTER TENNIS CLUB



Membership private tennis club run on a lease from the Bathurst estate, with 4 hard surface outdoor courts. It sits within Cirencester Park towards the education quarter and has been there since 1993. It is accessed by vehicle from Tetbury Road or on foot through the park from Cecily Hill. Well supported with tournaments, coaching and recreational play.

17. CITY BANK ALLOTMENTS



Located off Queen St along the River Churn, City Bank allotments of 1.02 hectares are owned and managed by and connect with the City Bank nature reserve area. The site has easy access to plenty of water due to the close proximity of the river. Owned by Cirencester Town Council.

18. CITY BANK NATURE RESERVE



City Bank was established in 2018 and is part of an area covering Victoria Road Playing Fields, The Glade, City Bank field and the Old Nursery. Nestled amongst the nearby houses, this area is a sanctuary for wildlife and a great space for recreation whilst connecting walkers to City Bank Park and beyond. Volunteers maintain the area which is a haven for wild orchids, a wide range of birds with otters, kingfishers, and water voles. Wildlife themed events and activities are regularly held as part of Love Parks Week and by local wildlife groups offering guided tours and talks. Access is from Victoria Rd or through City Bank Park. Owned by Cirencester Town Council.

19. CITY BANK RECREATIONAL GROUND



Flat open recreational field of 1.56 hectares bordered and enclosed by City Bank Park and City Bank View, with footpath access through to the adjacent nature reserve. Used mainly for leisure it also connects, by footpaths, the Beeches area of the town to Watermoor, and is well used by dog walkers. Access has been improved with the addition of a wood bridge over the River Churn which meanders along its edge. Fitness equipment sits near the remains of a sluice gate to one of the towns former mills. Ownership with Cirencester Town Council.

20. CRICKLADE ROAD PICNIC AREA



Enclosed by the A419 Swindon Rd Bypass and Cricklade Rd retail sites, this 1.21 hectare parcel of land provides a free opportunity for the public to sit and enjoy the wide stretch of the River Churn within and from several picnic benches. No allocated parking but well served by pavements and a nearby pedestrian crossing. Owned by Cotswold District Council.

21. CRICKLADE STREET/WEST WAY SEATING



Pedestrian connection and vehicle turnaround point between Cricklade Street and West Way containing seating and landscaping, sometimes used as a spot for busking musicians. Adopted public highway, owned and maintained by Gloucestershire County Council.

22. DEER PARK SECONDARY SCHOOL & CIRENCESTER COLLEGE PLAYING FIELDS



Deer Park Secondary School (2.9 hectares) and Cirencester College (2.42 hectares) are accessed from the Tetbury or Stroud roads and used by students of each establishment.

23. FOUR ACRE FIELD



Four Acre field covers 1.7 hectares in the Chesterton area of Cirencester and is bordered by Querns Wood, Chesterton Lane, Cotswold Close and the rear gardens of Chesterton Park. Used by dog walkers, weekend footballers and for other recreational activities, it contains a small playground and some outdoor fitness equipment. Recent re-wilding has extended its biodiversity and wildlife value with footpaths connected walkers through Querns wood to the town centre. Owned by Cirencester Town Council.

24. HAREBUSH WOOD



Harebush Wood was created in the 1820's by Jane Chester Master as a working 26.8 hectares wood with active timber production and remains privately owned by the family. It is open to the public as a circular walk on the edges of the town, home to bluebells and wildlife, accessible opposite the Norman Arch on the A417 Grove Lane or through the Burford Rd allotments. Owned by the Chester-Masters.

25. HOLY TRINITY GARDEN OF REMEMBRANCE



Garden of Remembrance within the grounds of Holy Trinity Church Watermoor Rd, accessed through the churchyard towards the rear of the church. It is 0.08 hectares in size with some seating and a memorial stone plaque stating its function. Not a burial ground.

26. HOSPITAL GROUNDS



Cirencester Hospital has the largest NHS grounds in Gloucestershire at 6.76 hectares and contains areas of meadow and courtyards that provide a respite for staff and patients, whilst connecting, through a footpath, to Querns wood and onwards to the Amphitheatre, well used by walkers. A cleared open space with seating provides the opportunity for outdoor small events or performances and there is a small orchard. NHS ownership.

27A. HUMPTY DUMPS (BOWLING GREEN ROAD)



Humpty Dumps (Bowling Green Road) is an area of open land (0.28 hectares) bordered by Bowling Green, Road and Crescent. It is well used by riders and walkers, with other recreational activity including sledging from the sloping parts, mountain bike riding, kite flying and star gazing. Informal paths connect the area to the town centre as well as providing a visual link between the urban landscape and agricultural land. The site is a haven for wildlife. Owned by Cirencester Town Council.

27b. HUMPTY DUMPS (BOWLING GREEN LANE/AVE)



Humpty Dumps (Bowling Green Lane/Ave) is an area of open land (4.8 hectares) off Berry Hill Crescent and Road. To the north west is a working farm with parts of the area used to graze sheep. Foot and bridle paths run through the site, both well used by riders and walkers, with other recreational activity including sledging from the sloping parts, mountain bike riding, kite flying and star gazing. Informal paths connect the area to the town centre as well as providing a visual link between the urban landscape and agricultural land. The site is a haven for wildlife. Privately owned.

28. JACK GARDNER MEMORIAL GARDEN



Named after former Cirencester UDC Councillors John Edward Gardner and Graham Jack Brookes, the garden is a linear strip of recreational parkland, 1.87 hectares in size fronted by the A417 Abbey Way, bordered by Spitalgate Lane, Gooseacre Lane and the housing of Trafalgar Road. It contains a stretch of the River Churn and within has had the recent addition of rewilding areas with further tree planting to support others including a memorial tree to the actor Robert Adie. Appreciated by dog walkers, it also connects by footpath over Gooseacre Lane bridge, the East or Stratton area of the town with the town centre. Ownership with Cirencester Town Council.

29. KINGSHILL COUNTRY PARK



On the site of an old water meadow this 2.34 hectare Country Park sitting alongside a recent large housing development bordering the A419 Swindon Rd bypass and hosts an outside gym with a running/walking track. There are benches for picnics and a community orchard. Well used by local residents with access from Griffiths Close, it provides a circular recreational space alongside acting as a green buffer between residences and a major highway. Located within are 50 allotment plots. Owned by Cirencester Town Council.

30. KINGSHILL SCHOOL PLAYING FIELDS



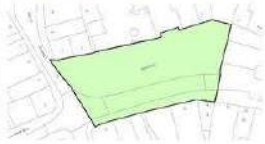
The Kingshill School Playing Fields sit adjacent to Kingshill Sports and Recreation Facility on Kingshill Lane and are used by students of the school.

31. KINGSHILL PLAYING FIELD (ALSO KNOWN AS KINGSHILL SPORTS DEVELOPMENT)



Kingshill Park covering 12.92 hectares sits adjacent to Kingshill secondary and Watermoor primary schools on Kingshill Lane, an open area of field which sits alongside Coronium Stadium, home to Cirencester football team. Within is an open-air skate park, opened in 2014, and several footpaths connect walkers from here and London Road to the Beeches past former railway lines and on to the town centre roads. Owned by Cirencester Town Council.

32. MARKET PLACE



Dominated by the church of St John Baptist, the Market Place forms the principle space of the town having acted as the focus for social, religious and community activities since the early Medieval period. It retains its pre-eminence as the most important community space to a significant degree as a triangular area bordered by West Market Place at its most northern point leading south towards the junction with North Way. The mainly listed buildings within evolved as the town established itself from its medieval origins as a major centre of trade including a 14th century coaching inn, now the Kingshead Hotel. Significant structural changes to the area occurred from the eighteenth century onwards and most extensively during the nineteenth and twentieth centuries such as the opening of the Corn Hall in 1861. Recent changes have included extending the pedestrianised areas by removing the central parking bays. Today it still serves as the main location for trade, religious services and an annual mop fair. Various ownership

33. OLD TESCO SUPERMARKET SEATING AREA



Pedestrian area of 0.09 hectares with bench seating with foot traffic connection from the Brewery Car park to Castle Street or through an open passageway to the Sheep Street car park, dominated by the larger retail units that surround it. Privately owned

34. OPEN AIR SWIMMING POOL



Located on the edge of Cirencester Park, 0. 15 hectares and accessed from Riverside Walk off Thomas St, Cirencester Outdoor Pool is one of the oldest open-air pools in the country. Built by the Bathurst family about 1869 and later given to the town, now run as a charity, there is a 28-metre main pool, fed by a natural spring, with slide, separate children's paddling pool and a small refreshment café. Very popular with residents and visitors, it opens seasonally between May and September with booking essential to gain admission. Run as a charity by the open-air pool association with the land leased from Cirencester Town Council.

35. PURLEY ROAD ALLOTMENTS



Owned by the Bingham Library Trust and managed by Cirencester Town Council, the Purley Road allotments of 0.17 hectares are located behind the early 20th century Purley Road properties at the Cirencester primary school playing field end. They are the smallest town allotment sites with just 7 plots.

36. QUAKER MEETING HOUSE QUIET GARDEN



The Quaker Garden is to the rear of the meeting house at 53 Thomas Street 0.02 hectare in size. Once a burial ground, it was re-landscaped by WW1 German prisoners as a garden and the headstones moved to its perimeter wall where they still rest. Open to the public once a week as a place for quiet reflection with mature trees and seating. Owned by the Quakers.

37. QUEEN STREET ALLOTMENT GARDENS



Located behind private homes on the corner of Victoria Road and Queen Street - near to, but not part of, the City Bank Allotments.

38. QUERNS WOOD



Querns Wood, accessed from and bordered by the hospital grounds, the Amphitheatre and Four Acre field, is an area of woodland with the NHS hospital grounds which includes a network of footpaths used by walkers to connect Chesterton to the town centre and for recreational use. Originally an arboretum established by the owner of Querns House, now the hospital, the site is believed to be part of the Quarry area that became the Amphitheatre. Mainly maintained by volunteers several new trees have been donated by local businesses. Owned by Cirencester Town Council.

39. ROYAL AGRICULTURAL UNIVERSITY PLAYING FIELDS



The Royal Agricultural University Playing Fields (4.85 hectares) are accessed from the Tetbury or Stroud Roads and used by students of the establishment.

40. SOMERFORD ROAD ALLOTMENTS



The Somerford Rd allotments of 3.4 hectares are situated to the north west of the town accessed from Somerford road and backing on to the residential housing of Oaklands, owned and managed by the Bathurst estate.

41. SPRINGFIELD ROAD ALLOTMENTS



Located next to Thistle Park. The site has a secured gated access but limited parking and is owned by Cirencester Town Council.

42. ST JOHN'S CHURCHYARD



To the rear of the church of St Johns the Baptist, the cemetery was closed to burials in 1871 and contains 25 grade 1 listed tomb monuments and other headstones in various states of repair with many mature trees and a recent war memorial bench. Accessed through a passage from the Market Place or by the rear door of the church on Gosditch St the area is maintained by volunteers.

43. ST MICHAEL'S PARK



St Michaels Park is located a short walk from the Market Place, bordered by Watermoor Rd, King St, the Avenue and Chester St. The main entrances are from the Tower St direction and on King Street, with public access daily, there are no allocated parking. Formal and informal open lawns and spaces include hard surface tennis courts, a children's play area, mini golf, boules, table tennis and crazy golf. The Park was developed in 1984 by , is 2.72 hectares and has a variety of formal and informal sports and recreation facilities and large open lawns. A winding path connects King street to Tower Street, much appreciated as a route from and towards the town centre. A variety of events are held at the park throughout the year such as Love Parks Week, a Teddy bears Picnic and outdoor cinema. A seasonal café provides refreshments and BBQs can be rented. Ownership with Cirencester Town Council.

44. STRATTON CEMETERY



Opened in 1888 and sitting next to St Peters Church, Stratton, the site is 1.1 hectares, still in use and accessed through a small car park from Overley Rd. Owned and managed by Cotswold District Council.

45. THISTLE PARK CHESTERTON COMMUNITY GARDEN



Thistle park community garden is set within a green open space landscaped with flowers and benches in the Chesterton estate, accessed along Springfield Rd. It contains a playground, open gym equipment and allotments owned and managed by Cirencester Town Council.

46. TWO ACRES



Two Acre field covers 2.2 hectares in the Chesterton area of Cirencester is bordered by Cranhams Lane on which there is gated access and the rear gardens of Foxes Bank Drive and Countess Lilias Rd. Used by dog walkers and for other recreational activities it connects by footpath to Thistle Park and onwards to the Thistle Park Community garden. Owned by Cirencester Town Council.

47. VICTORIA ROAD MEADOW



Located to the rear of Cirencester Junior School on Victoria Road, this former playing field has been restored to a meadow of wild flowers through the Wild Town rewilding scheme. Access from a passageway off Victoria Rd, a footpath connects through the meadow to City Bank nature reserve and the Beeches area of town. Well used by walkers.

48. WATERMOOR ROAD CEMETERY



Dissenter burial ground of 0.03 hectares on Watermoor Road no longer in use through a gated entrance next to several Almhouses. Owned and managed by Cotswold District Council.

49. WATERMOOR ROAD/WAY CORNER SEATING



Development of an unused piece of open land by a local community group as and bordered by Watermoor Rd, Watermoor Way and School Lane, with seating, landscaping and a large art sculpture Hare used as part of the town's walking Hare trail. Adopted public highway, owned and maintained by Gloucestershire County Council.

Cirencester Neighbourhood Plan

Habitats Regulations Assessment Screening Report

Cotswold District Council

Final report
Prepared by LUC
October 2022

Version	Status	Prepared	Checked	Approved	Date
1	Draft HRA Screening Report	K Nicholls	K Sydney	K Nicholls	20.10.2022
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Chapter 1
Introduction

1.1 LUC has been commissioned by Cotswold District Council to carry out Habitats Regulations Assessment (HRA) Screening of the Cirencester Neighbourhood Plan. The Neighbourhood Plan has been developed by a steering group supported by Cirencester Town Council and covers the full extent of the electoral boundary of the Town Council. This HRA report assesses the impacts of the Pre-Submission (Regulation 14) Draft Neighbourhood Plan (September 2022).

The requirement to undertake Habitats Regulations Assessment of development plans

1.2 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007 **[See reference 1]**; the currently applicable version is the Habitats Regulations 2017 **[See reference 2]**, as amended. Prior to the Cirencester Neighbourhood Plan being made, the Council is therefore required by law to carry out an HRA. The Council can commission consultants to undertake HRA work on its behalf and this (the work documented in this report) is then reported to and considered by the Council as the 'competent authority'. The Council considers this work and would usually **[See reference 3]** only progress a plan if it considers that the plan will not adversely affect the integrity **[See reference 4]** of any 'European site', as defined below. The requirement for authorities to comply with the Habitats Regulations when preparing a plan is also noted in the Government's online Planning Practice Guidance **[See reference 5]** (PPG).

1.3 HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). These were classified under European Union (EU) legislation but, since 1 January 2021, are protected in the UK by the Habitats Regulations 2017 (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive **[See reference 6]**) and species (Annex II). The listed habitat types and species (excluding birds) are those considered to be most in need of conservation at a European level. Designation of SACs also has regard to the threats of degradation or destruction to which the sites are exposed and, before EU exit day, to the coherence of the 'Natura 2000' network of European sites. After EU exit day, regard is had to the importance of such sites for the coherence of the UK's 'national site network'.
- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive **[See reference 7]**), and for regularly occurring migratory species not listed in Annex I.

1.4 The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites **[See reference 8]** and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper **[See reference 9]** on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new 'national site network'.
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap

with SACs and SPAs and may be designated for the same or different species and habitats.

1.5 Although Ramsar sites do not form part of the new national site network, Government guidance **[See reference** 10**]** states that:

1.6 “Any proposals affecting the following sites would also require an HRA because these are protected by government policy:

- proposed SACs
- potential SPAs
- Ramsar sites - wetlands of international importance (both listed and proposed)
- areas secured as sites compensating for damage to a European site.”

1.7 Furthermore, the NPPF **[See reference 11]** and practice guidance **[See reference 12]** currently state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs.

1.8 The legislative requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves. For simplicity, this report uses the term 'European site' to refer to all types of designated site for which Government guidance requires an HRA. The overall purpose of the HRA is to conclude whether or not a proposal or policy, or whole development plan would adversely affect the integrity of the European site in question. This is judged in terms of the implications of the plan for a site’s ‘qualifying features’ (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Stages of Habitat Regulations Assessment

1.9 The section below summarises the stages involved in carrying out an HRA, based on various guidance documents **[See reference 13 and 14]**. This HRA report presents the methodology and findings of Stage 1: Screening. Further details of the approach to Screening are provided in Chapter 3. Relevant legislation and case law that has informed the HRA methodology is described in Appendix A.

Stage 1: Screening (the 'Significance Test')

Tasks

- Description of the development plan and confirmation that it is not directly connected with or necessary to the management of European sites.
- Identification of potentially affected European sites and their conservation objectives.
- Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction (‘mitigation’) measures.

Outcome

- Where effects are unlikely, prepare a ‘finding of no significant effect report’.
- Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.

Stage 2: Appropriate Assessment (the 'Integrity Test')

Task

- Information gathering (development plan and data on European sites).
- Impact prediction.
- Evaluation of development plan impacts in view of conservation objectives of European sites.
- Where impacts are considered to directly or indirectly affect qualifying features of European sites, identify how these effects will be avoided or reduced ('mitigation').

Outcome

- Appropriate Assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation, including the mechanisms and timescale for these mitigation measures.
- If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.

Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation

Task

- Identify and demonstrate 'imperative reasons of overriding public interest' (IROPI).
- Demonstrate no alternatives exist.
- Identify potential compensatory measures.

Outcome

- This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

Previous HRA work

1.10 The Cirencester Neighbourhood Plan is a new plan and has not previously been subject to HRA. However, HRA work has been undertaken for the Cotswold District Local Plan.

1.11 The Local Plan was adopted in 2018 and the most recent iteration of the HRA of the Local Plan was prepared by LUC in 2017. LUC is currently undertaking the HRA of the Local Plan Partial Update. Information from these Local Plan HRAs has informed the HRA of the Cirencester Neighbourhood Plan, where relevant.

Structure of this report

1.12 This chapter (Chapter 1) described the background to the production of the Cirencester Neighbourhood Plan and the requirement to undertake HRA. The remainder of the report is structured as follows:

- Chapter 2: Cirencester Neighbourhood Plan summarises the content of the plan, which is the subject of this report.
- Chapter 3: Method sets out the approach used, and the specific tasks undertaken during the screening stage of the HRA.
- Chapter 4: Screening assessment describes the findings of the screening stage of the HRA.
- Chapter 5: Conclusions and next steps summarises the HRA conclusions for the Cirencester Neighbourhood Plan and describes the next steps to be undertaken.

1.13 The information in the main body of the report is supported by the following appendices:

- Appendix A provides details of relevant legislation and case law.
- Appendix B presents a map showing the European sites within 15km of the Cirencester Neighbourhood Plan Area.
- Appendix C sets out information about the European sites that are the focus of the HRA.

Chapter 2

Cirencester Neighbourhood Plan

Vision

2.1 The overarching vision for Cirencester by the end of the Neighbourhood Plan period in 2033 is:

Our vision for Cirencester, in the period to 2033, is to pass on to future generations a historic and vibrant, welcoming, and friendly rural market town with a strong sense of community. It will be rich in heritage, character, and cultural opportunities.

Cirencester will thrive by capitalising on its heritage and the character of its urban streets while facilitating sympathetic, high quality and sustainable economic and residential growth. This will deliver for all residents and users of the Town while, at the same time, respecting the environment and supporting employment and skills opportunities which respond to the climate emergency.

The Town will be well connected to a series of green parks and open spaces, nature, and the surrounding countryside, which will remain key attributes with improvements where appropriate. Opportunities for walking and cycling that link all areas of the town and its surrounding towns, villages and countryside will be enhanced.

All areas of the town will have easy and accessible access to key services, including transport, with a more diverse cultural scene and sport and recreation facilities that meet the needs of a growing population.

Objectives

2.2 The overarching vision is supported by a series of objectives. The objectives for the Cirencester Neighbourhood Plan are as follows:

1. Maintain, protect, and enhance the distinctive Cotswold-rich visual character, views and heritage of Cirencester, its immediate historic setting and vistas and its connections to the surrounding areas.

2. Require all new development to contribute to the 20 Minute Neighbourhood model of development through the creation of safe, sustainable, liveable, and mixed communities with active transport to jobs and essential services to meet the daily needs of the community.

3. Create a robust yet flexible network of streets and shared spaces that promote all modes of active travel leading to reduced reliance on private vehicles. To support this, there is a need for enhanced public transport and a mobility hub.

4. More effectively integrate the outlying residential areas (e.g., Kingshill, Kingsmeadow, Stratton, Chesterton) by foot, cycle, and public transport to the town centre, which are currently hindered by highway barriers and footpath gaps. The key barrier is that created by the A419 and A429 road system which wraps around Cirencester town centre, frustrating easy access to the middle from outlying residential areas and safe links to the surrounding countryside.

5. Facilitate a reduction in carbon emissions and contribute to achieving the national goal of Net Zero by adopting and implementing the relevant recommendations.

6. Protect, maintain, and enhance the natural environment, including local green spaces, parks, trees and green buffers, habitats, the River Churn, Gumstool Brook and all wildlife corridors alongside their connection to the wider landscape, promoting biodiversity and planting native species where possible.

7. Improve the sustainability of new build development through use of low carbon materials, construction methods and facilitate low carbon running carbon costs in accordance with the Cotswold Design Code.

8. Ensure that land made available for new developments better facilitates and maintains a vibrant connected, economically active, and sustainable Town Centre without adding to congestion or flood-risk.

9. Prioritise new residential development towards affordable homes and first time buyers and avoid age-specific residences.

10. Minimise future flood risk by protecting and, where possible, extending the functional floodplain. Require new developments to provide multifunctional mitigation measures, such as sustainable urban drainage systems, to ensure that rainwater is attenuated within the site. Support solutions to improve the management of the river flow on the upper Churn to reduce flooding and drying up.

11. Protect existing, and deliver new easily accessible, community infrastructure, including for primary health care, skills development, recreation, sport, leisure, and cultural enrichment, to fill existing gaps and support the future of Cirencester and its population growth.

12. Facilitate a reduction in noise and light pollution within the town and in new development whilst maintaining and improving air quality through a reduction in emissions.

13. Support skills development for local people.

2.3 These objectives are used as a framework for the Neighbourhood Plan policies.

Policies

2.4 The policies within the Cirencester Neighbourhood Plan are listed below. New development provided for within the Cirencester Neighbourhood Plan is expected to be in line with the Cotswold Local Plan, and no development sites are allocated within the Cirencester Neighbourhood Plan.

Town Centre

- Policy TC1: Town Centre/General Development
- Policy TC2: Town Centre/Master Plan

Access and Movement

- Policy AM1: Better Links between Town Centre & Neighbourhoods
- Policy AM2: Better Links between Neighbourhoods & Countryside
- Policy AM3: The Pedestrian Environment
- Policy AM4: Promotion of an Access and Mobility Hub
- Policy AM5: Promotion of Active Travel Modes

Design and Built Environment

- Policy DBE1: 20 Minute Neighbourhood Model (20MN)
- Policy DBE2: Heritage Protection of Landscape and Townscape Views
- Policy DBE3: Contributing to the Local Cotswold Character
- Policy DBE4: Affordable Housing
- Policy DBE5: Principal Residence Requirement
- Policy DBE6: Ground Floor Conversion and Use of Upper Floors
- Policy DBE7: Sustainable Construction
- Policy DBE8: Non Designated Heritage Assets

Quality of the Public Realm

- Policy QPR1: Quality Streets and Spaces
- Policy QPR2: Social and Civil Spaces
- Policy QPR3: Heritage Trails and Wayfinding Systems

Local Economy

- Policy LE1: Protect and Enhance Economic Activity
- Policy LE2: Provision for Innovative Work Spaces, New and Small Businesses
- Policy LE3: Skills Development
- Policy LE4: New Employment Premises and Design Quality

Natural Environment

- Policy NE1: Biodiversity and the Natural Environment

- Policy NE2: Green Corridors, Footpaths, Surrounding Landscape and Skylines
- Policy NE3: Biodiversity and the Natural Environment in Peripheral Areas
- Policy NE4: Flood Resilience
- Policy NE5: Cirencester Designated Local Green Spaces

Well-Being and Community

- Policy WBC1: Improve Air Quality
- Policy WBC2: Health Impact Assessments (HIA)
- Policy WBC3: Access to Green Spaces
- Policy WBC4: Outdoor Recreation Spaces
- Policy WBC5: New Community Services and Facilities
- Policy WBC6: Minimise Light Pollution
- Policy WBC7: Design and Public Safety

Chapter 3

HRA Screening Method

3.1 HRA Screening of the Cirencester Neighbourhood Plan has been undertaken in line with current available guidance and sought to meet the requirements of the Habitats Regulations. The tasks that were undertaken during the screening stage of the HRA are described in detail below; and the conclusions reached are provided in Chapter 4. Relevant legislation and case law is described in Appendix A.

3.2 The purpose of the screening stage is to:

- Identify all aspects of the plan which would have no effect on a European site, so that that they can be eliminated from further consideration in respect of this and other plans.
- Identify all aspects of the plan which would not be likely to have a significant effect on a European site (i.e. would have some effect because of links/connectivity, but which are not significant), and which therefore do not require 'Appropriate Assessment'. These effects are considered in relation to the plan both alone and in combination with other aspects of the same plan or other plans or projects,
- Identify those aspects of the plan where it is not possible to rule out the risk of significant effects on a European site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the plan that will require Appropriate Assessment.

Identifying European sites that may be affected and their conservation objectives

3.3 In order to initiate the search of European sites that could potentially be affected by a development, it is established practice in HRA to consider sites within the area covered by the plan, and other sites that may be affected beyond this area.

3.4 A distance of 15km from the boundary of the plan area is typically used in the first instance to identify European sites with the potential to be affected by the proposals within a development plan. Consideration is then given to whether any more distant European sites may be connected to the plan area via effects pathways, for example through hydrological links or recreational visits by residents. The 15km distance has been agreed with Natural England for HRAs elsewhere and is considered precautionary. All European sites within 15km have been assessed in this HRA.

3.5 The assessment also takes into account areas that may be functionally linked to the European sites. The term ‘functional linkage’ is used to refer to the role or ‘function’ that land beyond the boundary of a European site might fulfil in terms of supporting the species populations for which the site was designated or classified. Such an area is therefore ‘linked’ to the site in question because it provides a (potentially important) role in maintaining or restoring a protected population at favourable conservation status.

3.6 While the boundary of a European site will usually be drawn to include key supporting habitat for a qualifying species, this cannot always be the case where the population for which a site is designated or classified is particularly mobile. Individuals of the population will not necessarily remain in the site all the time. Sometimes, the mobility of qualifying species is considerable and may extend so far from the key habitat that forms the SAC or SPA that it would be entirely impractical to attempt to designate or classify all of the land or sea that

may conceivably be used by the species **[See reference 15]**. HRA therefore considers whether any European sites make use of functionally linked habitats, and the impacts that could affect those habitats.

3.7 Three European sites are within 15km of the Cirencester parish boundary:

- North Meadow and Clattinger Farm SAC (c.5.5km south and south east);
- Cotswold Beechwoods SAC (c.9km north west); and
- Rodborough Common (c. 10km west).

3.8 These sites are shown on the figure in Appendix B. Detailed information about each European site is provided in Appendix C, described with reference to Standard Data Forms for the SPAs and SACs, and Natural England's Site Improvement Plans **[See reference 16]**. Natural England's conservation objectives **[See reference 17]** for the SPAs and SACs have also been reviewed.

3.9 None of the sites with 15km of the parish boundary has qualifying features that require functionally linked habitat (i.e. mobile species such as bats or birds). Functionally linked land from the Severn Estuary SPA and Ramsar site is considered in the HRA of the emerging Cotswold District Local Plan; therefore the potential for likely significant effects on those sites as a result of the Cirencester Neighbourhood Plan is considered in the next section. No other European sites beyond 15km from the parish boundary are considered to be linked to the Plan area.

Assessment of 'likely significant effects' of the plan

3.10 As required under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 **[See reference 18]** (as amended), an assessment has been undertaken of the 'likely significant effects' of the plan. The assessment has been prepared in order to identify which policies would be

likely to have a significant effect on European sites. The screening assessment has been conducted without taking mitigation into account, in accordance with the 'People over Wind' judgment (see Appendix A).

3.11 A risk-based approach involving the application of the precautionary principle has been adopted in the assessment, such that a conclusion of 'no significant effect' is only reached where it is considered unlikely, based on current knowledge and the information available, that a development plan policy would have a significant effect on the integrity of a European site.

3.12 Relevant case law helps to interpret when effects should be considered as a likely significant effect, when carrying out HRA of a land use plan (see Appendix A).

3.13 A screening assessment has been prepared, to document consideration of the potential for likely significant effects resulting from each policy in the Cirencester Neighbourhood Plan. A summary of the findings of this assessment is provided in Chapter 4.

Assessment of potential in-combination effects

3.14 Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where "a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site". Therefore, where likely insignificant effects are identified for the plan alone, it is necessary to consider whether these may become significant effects in combination with other plans or projects.

3.15 Where the plan is likely to have an effect on its own (due to impact pathways being present), but it is not likely to be significant, the in-combination assessment at Screening stage needs to determine whether there may also be

the same types of effect from other plans or projects that could combine with the plan to produce a significant effect. If so, this likely significant effect arising from the plan in combination with other plans or projects, would then need to be considered through the Appropriate Assessment stage to determine if the impact pathway would have an adverse effect on integrity of the relevant European site. Where the screening assessment has concluded that there is no impact pathway between development proposed in the plan and the conditions necessary to maintain qualifying features of a European site, then there will be no in-combination effects to assess at the Screening or Appropriate Assessment stage. This approach accords with recent guidance on HRA **[See reference 19]**.

3.16 If impact pathways are found to exist for a particular effect but it is not likely to be significant from the plan alone, the in-combination assessment will identify which other plans and programmes could result in the same impact on the same European site. This will focus on planned growth (including housing, employment, transport, minerals and waste) around the affected site, or along the impact corridor.

3.17 The potential for in-combination impacts would therefore focus on plans prepared by local authorities that overlap with European sites that are within the scope of this HRA. The findings of any associated HRA work for those plans would be reviewed where available. Where relevant, any strategic projects in the area that could have in-combination effects with the plan would then also be identified and reviewed.

Types of impact that have been considered

3.18 Consideration has been given to the potential for the development proposed to result in significant effects associated with the following types of impact:

- Physical loss or damage to habitat;

- Non-physical disturbance (noise, vibration and light pollution);
- Non-toxic contamination;
- Air pollution;
- Recreation pressure; and
- Changes to water quantity or quality.

3.19 Assumptions relating to these types of impact are set out below.

Physical loss or damage to habitat

3.20 Physical loss or damage to habitat will only occur where development is within the boundaries of a European site, or its functionally linked land. There are no European sites within the Plan area and functionally linked land is not relevant to the sites within 15km. Therefore, there is no impact pathway for physical loss or damage to habitat and this impact has not been assessed in the HRA Screening.

Non-physical disturbance

3.21 Non-physical disturbance is most likely to be significant within a distance of 500 metres from a European site. Noise and vibration effects are most likely to disturb bird species and thus a key consideration with respect to European sites were birds are the qualifying features. Artificial lighting at night has the potential to affect species where it occurs in close proximity to key habitat areas, such as key roosting sites of SPA birds. There are no European sites or functionally linked land within 500m of the Plan area; therefore there is no impact pathway for non-physical disturbance and this impact has not been assessed in the HRA Screening.

Non-toxic contamination

3.22 Non-toxic contamination can include the creation of dust which can smother habitats preventing natural processes and may also lead to effects associated with increased sediment and dust which can potentially affect the turbidity of aquatic habitats and can also contribute to nutrient enrichment which can lead to changes in the rate of vegetative succession and habitat composition. The effects of non-toxic contamination are most likely to be significant if development takes place within 500m of a European site with qualifying features sensitive to these disturbances, such as riparian and wetland habitats, or sites designated for habitats and plant species. There are no European sites or functionally linked land within 500m of the Plan area; therefore there is no impact pathway for non-toxic contamination and this impact has not been assessed in the HRA Screening.

Air pollution

3.23 Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by deterioration in habitat as a result of air pollution. In terms of vehicle traffic, nitrogen oxides (NOx, i.e. NO and NO2) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NOx can cause eutrophication of soils and water.

3.24 Based on the Highways England Design Manual for Road and Bridges (DMRB) LA 105 Air quality **[See reference** 20**]** (which sets out the requirements for assessing and reporting the effects of highway projects on air quality), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.

All three European sites within 15km of the Plan area are sensitive to air pollution (see Appendix C). Cotswold Beechwoods and Rodborough Common SACs are both within 200m of the A46 and North Meadow and Clattinger Farm SAC is within 200m of the A419. Therefore, air pollution has been considered within the HRA Screening.

Recreation pressure

3.25 Recreation activities and human presence can result in significant effects on European sites. European sites with qualifying bird species are likely to be particularly susceptible to recreational disturbances, for example from walking, dog walking, angling, and illegal use of off-road vehicles and motorbikes. Recreation can also physically damage habitat as a result of trampling, fire or vandalism and also through erosion associated with terrestrial activities. All three European sites within 15km of the Plan area have habitats that are sensitive to recreation pressure (see Appendix C); therefore recreation pressure has been considered within the HRA Screening.

3.26 Each European site will typically have a 'Zone of Influence' (ZOI) within which increases in population would be expected to result in likely significant effects. ZOIs are usually established following targeted visitor surveys and the findings are therefore typically specific to each European site (and often to specific areas within a European site). ZOIs for the three European sites within 15km of the Plan area have been established through visitor survey work and are as follows:

- North Meadow and Clattinger Farm SAC: 8.0km **[See reference** 21**]**;
- Rodborough Common SA: 3.8km **[See reference** 22**]** and
- Cotswold Beechwoods SAC: 15.4km **[See reference** 23**]**.

3.27 Cirencester Parish therefore lies within the ZOIs of North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC but is outside of the ZOI for Rodborough Common SAC. Recreation impacts are therefore screened out of this HRA in relation to that site.

Changes to water quality or quantity

3.28 An increase in demand for water abstraction and treatment resulting from the growth can result in changes in hydrology at European sites. Depending on the qualifying features and particular vulnerabilities of the European sites, this could result in likely significant effects, for example, due to changes in environmental or biotic conditions, water chemistry and the extent and distribution of preferred habitat conditions.

3.29 North Meadow and Clattinger Farm SAC is sensitive to water pollution carried by flood waters (see Appendix C), while the qualifying habitats of Rodborough Common SAC are also sensitive to changes in water quality. While Cirencester is not hydrologically connected to Rodborough Common SAC there is a potential impact pathway for changes to water quality and/or quantity at North Meadow and Clattinger Farm SAC as the River Churn flows south from Cirencester towards the Cotswold Water Park which is adjacent to North Meadow and Clattinger Farm SAC and is potentially functionally linked to the Severn Estuary SPA and Ramsar site. Therefore, the potential for hydrological impacts on North Meadow and Clattinger Farm SAC has been assessed in the HRA Screening.

Chapter 4

Screening Assessment

4.1 As described in the Chapter 3, a screening assessment has been carried out in order to identify the likely significant effects of the plan on the scoped-in European sites. The detailed screening assessment, which sets out the decision-making process used for this assessment can be found below.

HRA Screening of policies

Policies with the potential for likely significant effects

4.2 This section provides an explanation of the HRA Screening conclusions reached in this HRA, in relation to impact type and European site. The following categories are used:

- Screened out – due to distance thresholds/lack of sensitivities of qualifying features as discussed in this chapter.
- No likely significant effects – as impact of Cirencester Neighbourhood Plan is unlikely to be significant on its own or in combination.

Policy TC1: Town Centre/General Development

4.3 This policy requires development to meet a number of design and planning principles; however the policy will not itself result in new development.

Policy TC2: Town Centre/Masterplan

4.4 This policy requires that proposals for the redevelopment of opportunity sites within Cirencester Town Centre adhere to certain design and planning principles. This policy will not itself result in new development.

Policy AM1: Better links between Town Centres and Neighbourhoods

4.5 This policy states that support will be given to proposals for new and enhanced active travel routes (walking and cycling) that successfully connect outlying neighbourhoods with the town centre. This policy will not result in new development.

Policy AM2: Better links between Neighbourhoods and Countryside

4.6 This policy states that support will be given to proposals for new and enhanced active travel routes (walking and cycling) that successfully connect outlying areas with the surrounding countryside. This policy will not result in new development.

Policy AM3: The Pedestrian Environment

4.7 This policy states that support will be given for an enhanced pedestrian experience throughout the plan area, through a range of coordinated measures. The policy will not itself result in new development.

Policy AM4: Promotion of an Access and Mobility Hub

4.8 This policy sets out criteria that will apply to any proposals for the redevelopment of a town centre site and the land immediately around for the purposes of a multi-modal access and mobility hub should. The policy will not itself result in new development.

Policy AM5: Promotion of Active Travel Modes

4.9 This policy sets out criteria that will apply to proposals for new development which are likely to generate increased pedestrian and/or vehicular traffic movement, in order to ensure that they will promote the use of active modes of travel. However, the policy will not itself result in new development.

Policy DBE1: 20 Minute Neighbourhood Model (20MN)

4.10 This policy states that all development proposals should demonstrate how they will contribute to the 20 Minute Neighbourhood Model (20MN) of connectivity to daily and weekly needs. It also sets out specific requirements that will apply to proposals that seek to support the 20MN. However, the policy will not itself result in new development.

Policy DBE 2 Heritage Protection of Landscape and Townscape Views

4.11 This policy states that proposals that obscure or result in the loss of the positive characteristics of significant views of and within the town will not be supported. The policy will not result in new development.

Policy DBE 3: Contributing to the Local Cotswold Character

4.12 This policy sets out criteria that will apply to proposals for new development in order to ensure that they are designed to respond positively to the Cotswold vernacular and to the distinctive Cirencester context. The policy will not itself result in new development.

Policy DBE 4: Affordable Housing

4.13 This policy sets out criteria relating to affordable housing, which will apply to residential development proposals. The policy will not itself result in new development.

Policy DBE 5: Principal Residence Requirement

4.14 This policy sets out criteria that will apply to residential developments, seeking to avoid the ongoing uncontrolled growth of dwellings used for second or holiday homes. The policy will not itself result in new development.

Policy DBE 6: Ground Floor Conversion and Use of Upper Floors

4.15 This policy sets out criteria that will apply to proposals for ground floor conversions and the use of upper floors in the town centre. It seeks to avoid adverse impacts on the appearance and character of the town centre and to support its vitality and viability. This policy will not result in new development.

Policy DBE 7: Sustainable Construction

4.16 This policy encourages applicants to design buildings to last, employing modern innovative technologies and methods of construction to reduce construction costs, speed up construction, and minimise energy consumption and carbon emissions during the building's lifetime. The policy will not itself result in new development.

Policy DBE 8: Non Designated Heritage Assets

4.17 This policy seeks to protect identified Non-Designated Heritage Assets from inappropriate demolition or alteration. This policy will not result in new development.

Policy QPR 1: Quality Streets and Spaces

4.18 This policy seeks to protect and enhance historic streets, parks, gardens and spaces across Cirencester. This policy will not result in new development.

Policy QPR 2: Social and Civic Spaces

4.19 This policy supports new developments that provide for a clear network of well-designed social and civic spaces that can help support the cultural, social, and economic life of the town. This policy will not result in new development.

Policy QPR 3: Heritage Trails and Wayfinding Systems

4.20 This policy supports proposals for heritage trails, wayfinding systems and the improved signposting of existing pedestrian and cycle routes within the town. Proposals that would facilitate better connections between the town centre, the surrounding areas and the wider countryside will be particularly encouraged. This policy will not result in new development.

Policy LE1: Protect and Enhance Economic Activity

4.21 This policy seeks to protect and enhance existing economic activity and premises across the town centre and avoid the loss of employment uses. This policy will not result in new development.

Policy LE2: Provision for Innovative Workspaces, New and Small Businesses

4.22 This policy supports development proposals that provide innovative hybrid and/or mixed-use working spaces which encourage creative small businesses or community uses. This policy will not itself result in new development.

Policy LE3: Skills Development

4.23 This policy supports development proposals that provide opportunities for training, obtaining skills and education. Proposals that will provide enhancements to existing skills and training facilities will be supported; however the policy will not itself result in new development.

Policy LE4: New Employment Premises and Design Quality

4.24 This policy sets out design criteria that will apply to proposals for new employment development outside existing industrial and employment areas, and requires them to demonstrate how they respect local character. The policy will not itself result in new development.

Policy NE 1: Biodiversity and the Natural Environment

4.25 This policy sets out criteria that will apply to development proposals to ensure that they protect and enhance biodiversity. This policy will not result in new development.

Policy NE 2: Green Corridors, Footpaths, Surrounding Landscapes and Skylines

4.26 This policy requires proposals to preserve and enhance the natural beauty of the Cotswold AONB and requires a Landscape and Visual Assessment where development may be prominent or adversely affect local landscape character. This policy will not result in new development.

Policy NE 3: Biodiversity and the Natural Environment in Peripheral Areas

4.27 This policy sets out criteria that will apply to development proposals towards the periphery of the plan area, requiring them to demonstrate how they

will provide a net gain in biodiversity and avoid or mitigate adverse effects. This policy will not result in new development.

Policy NE 4: Flood Resilience

4.28 This policy sets out criteria that will apply to development proposals in order to increase flood resilience. It requires proposals which would add to water discharge to address potential flood risk risking sea levels, groundwater levels and surface runoff as relevant. This policy will not result in new development.

Policy NE 5: Cirencester Designated Local Green Spaces

4.29 This policy provides protection for existing local Green Spaces in Cirencester and will not result in new development.

Policy WBC 1: Improve Air Quality

4.30 This policy supports measures that improve air quality, especially through a reduction in road vehicle use in the town centre and near educational establishments, and during construction. This policy will not result in new development.

Policy WBC 2: Health Impact Assessment (HIA)

4.31 This policy requires a Health Impact Assessment (HIA) to be undertaken for larger sites. This policy will not result in new development.

Policy WBC 3: Access to Green Spaces

4.32 This policy supports proposals that improve and extend the existing footpath and cycle network, allowing greater access between places where people live, the town and village centres, green spaces, recreation areas and the open countryside. This policy will not result in new development.

Policy WBC 4: Outdoor Recreation Spaces

4.33 This policy supports planning proposals that invest in a network of appropriate play spaces and outdoor gyms and trails for all ages, creating new play spaces in places where gaps are identified. This policy will not result in new development.

Policy WBC 5: New Community Services and Facilities

4.34 This policy supports proposals for new and improved community services within the settlement boundary as well as utility infrastructure to meet the identified needs of the community. However, the policy will not itself result in new development.

Policy WBC 6: Minimise Light Pollution

4.35 This policy requires proposals for external lighting schemes in any new development to minimise light pollution This policy will not result in new development.

Policy WBC 7: Design and Public Safety

4.36 This policy sets out criteria which will apply to proposals for new development in the plan area in order to create and support a sense of safety This policy will not result in new development.

Chapter 5

Assessment Conclusion

5.1 At the Screening stage of HRA, no likely significant effects are predicted on European sites, either alone or in combination with other policies and proposals.

Summary of HRA Screening

5.2 The following impacts were screened out, as there is no potential impact pathway associated with development permitted by the Cirencester Neighbourhood Plan:

- Physical loss or damage to habitat;
- Non-physical disturbance; and
- Non-toxic contamination.

5.3 The following impacts were screened in as there is a potential impact pathway associated with development permitted by the Cirencester Neighbourhood Plan, but no likely significant effects have been identified:

- Air pollution (in relation to all three European sites);
- Recreation pressure (in relation to Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC); and
- Changes to water quality or quantity (in relation to North Meadow and Clattinger Farm SAC).

5.4 The Cirencester Neighbourhood Plan does not allocate any sites for development. While the final part of the Neighbourhood Plan lists Neighbourhood Plan Projects, some of which could involve some small-scale physical works, these are not specific development allocations set out in policy and would not go beyond the scale of development already provided for in the

Cotswold Local Plan. The scale and nature of these projects are not considered likely to have significant effects on either the Cotswold Beechwoods SAC, Rodborough Common SAC, North Meadow and Clattinger Farm SAC or Severn Estuary SPA or Ramsar site, alone or in combination with other plans.

Next steps

5.5 An Appropriate Assessment is not required for the Cirencester Neighbourhood Plan as none of the policies will directly result in new built development and likely significant effects from the plan can therefore be ruled out.

5.6 HRA is an iterative process and as such, this assessment should be updated if any relevant, newly available evidence or comments from key consultees are received prior to the plan being finalised. This report should be subject to consultation with Natural England to confirm that the conclusions of the assessment are considered appropriate at this stage of plan-making.

LUC
October 2022

Appendix A

Relevant legislation and case law

Requirements of the Habitat Regulations Assessment

A.1 In assessing the effects of the Plan in accordance with Regulation 105 of the Habitats Regulations (as amended), there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed, if necessary, by an Appropriate Assessment which will inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not:
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on the site, either alone or in combination with other plans or projects (the 'Significance Test'). [These two steps are undertaken as part of Stage 1: Screening shown above.] If so:
- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public. [This step is undertaken during Stage 2: Appropriate Assessment shown above.]
- Step 4: In accordance with Reg.105(4), but subject to Reg.107, give effect to the land use plan only after having ascertained that the plan will not adversely affect the integrity of the European site.

A.2 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the avoidance of likely significant

effects at Stage 1, and through Appropriate Assessment at Stage 2 by the inclusion of mitigation measures designed to avoid or reduce effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

A.3 The HRA should be undertaken by the 'competent authority', in this case Cotswold District Council, and LUC has been commissioned to do this on their behalf. The HRA also requires close working with Natural England as the statutory nature conservation body in order to obtain the necessary information and agree the process, outcomes and any mitigation proposals.

Relevant case law

Screening

A.4 This HRA has been prepared in accordance with relevant case law findings, including most notably the 'People over Wind' and 'Holohan' rulings from the Court of Justice for the European Union (CJEU).

A.5 The People over Wind, Peter Sweetman v Coillte Teoranta (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the screening stage. The precise wording of the ruling is as follows:

> "Article 6(3) ……must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of

measures intended to avoid or reduce the harmful effects of the plan or project on that site."

A.6 In light of the above, the HRA screening stage does not rely upon avoidance or mitigation measures to draw conclusions as to whether the CNP could result in likely significant effects on European sites. Instead, any such measures are considered at the Appropriate Assessment stage as relevant.

A.7 The approach to this HRA is also consistent with the Holohan v An Bord Pleanala (November 2018) CJEU judgement which stated that:

Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an 'appropriate assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that, where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'appropriate assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

A.8 In undertaking this HRA, LUC consider the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and/or species and habitats located beyond the boundaries of European site that may be important in supporting the ecological processes of the qualifying features, has also been fully considered in this HRA.

A.9 The approach to the HRA also needs to take into consideration the 'Wealden' judgement and the 'Dutch Nitrogen Case' judgements from the Court of Justice for the European Union.

A.10 Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority (2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

A.11 In light of this judgement, HRA therefore needs to consider traffic growth based on the effects of development from the plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

A.12 The 2018 'Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu (Dutch Nitrogen)' judgement stated that:

> "...the positive effects of the autonomous decrease in the nitrogen deposition…be taken into account in the appropriate assessment…, it is important that the autonomous decrease in the nitrogen deposition be monitored and, if it transpires that the decrease is less favourable than had been assumed in the appropriate assessment, that adjustments, if required, be made."

A.13 The Dutch Nitrogen judgement also states that according to previous case law:

> "…it is only when it is sufficiently certain that a measure will make an effective contribution to avoiding harm to the integrity of the site concerned, by guaranteeing beyond all reasonable doubt that the plan or project at issue will not adversely affect the integrity of that site, that such a measure may be taken into consideration in the 'appropriate assessment' within the meaning of Article 6(3) of the Habitats Directive."

A.14 The HRA of the Cirencester Neighbourhood Plan therefore will only consider the existence of conservation and/or preventative measures if the expected benefits of those measures are certain at the time of the assessment.

Interpretation of 'likely significant effects'

A.15 In the Waddenzee case **[See reference 24]**, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:

> An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (para 44). An effect should be considered 'significant', "if it undermines the conservation objectives" (para 48). Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned" (para 47).

A.16 A relevant opinion delivered to the Court of Justice of the European Union commented that:

> "The requirement that an effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill."

A.17 This opinion (the 'Sweetman' case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered 'trivial' or de minimis; referring to such cases as those "that have no appreciable effect on the site". In practice such effects could be screened out as having no likely significant effect – they would be 'insignificant'.

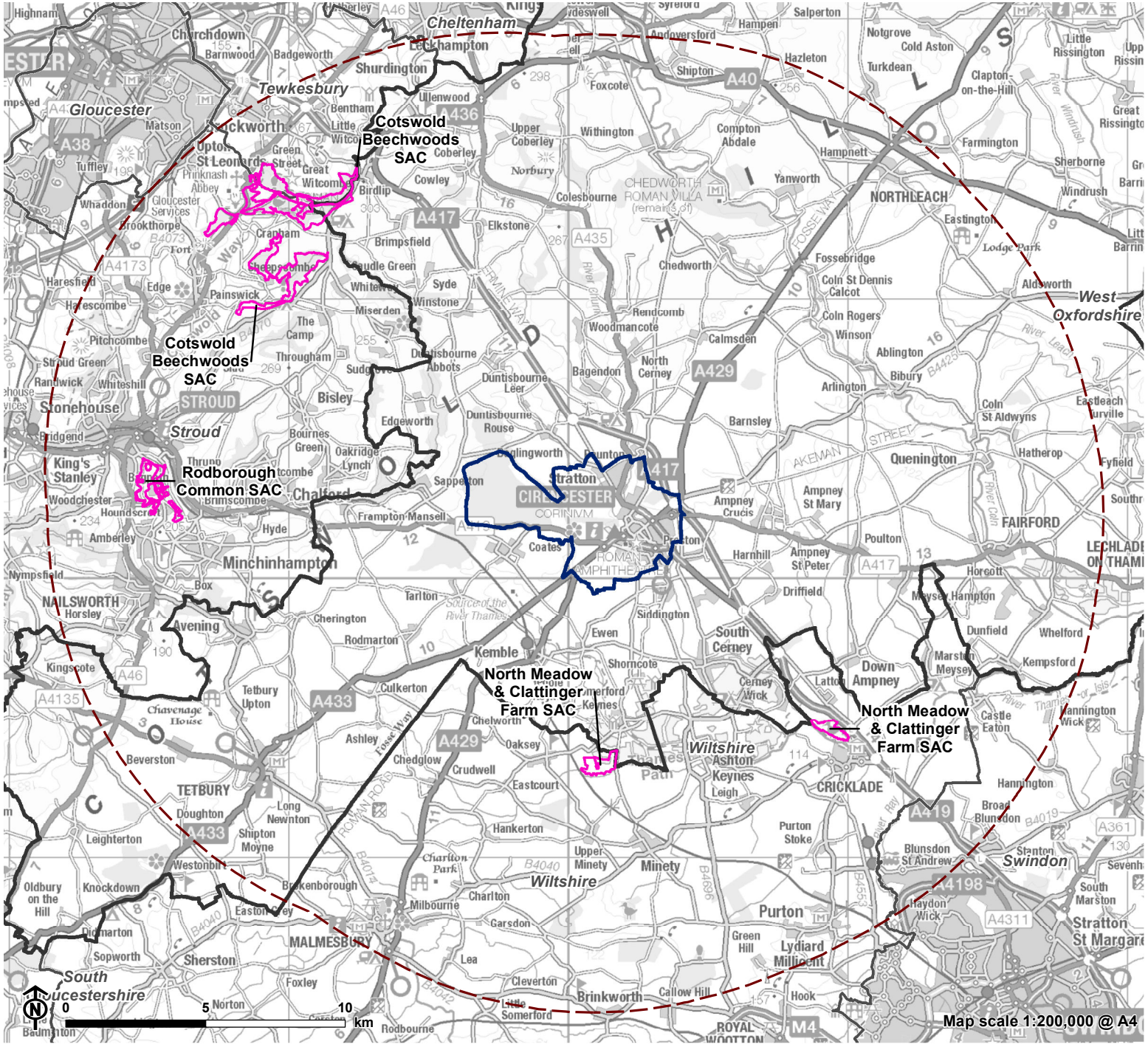
Appendix B

Map of European sites within 15km of the Cirencester Neighbourhood Plan Area

Cotswold Local Plan Partial Update – HRA
Cotswold District Council

LUC

Figure B.1: Map of European sites within 15km of the Cirencester Neighbourhood Plan Area



Cirencester Parish
15km from Cirencester Parish boundary
Cotswold District boundary
Surrounding Local Authorities

Habitat sites

Special Area of Conservation (SAC)

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OR 2022B:Tomlinson_J LUC 11703_FIGB_1_r1_EuropeanSitesWithin15kmCirenscesterParish_A4L 16/09/2022
Source: OS, NE

Appendix C

Attributes of European sites

C.1 This appendix contains information on the European sites scoped into the HRA. Site areas and designated features are drawn from SAC and SPA Standard Data Forms and Ramsar Site Information Sheets **[See reference 25]**. The overviews of sites and their locations are drawn from Natural England's Site Improvement Plans **[See reference 26]**. Site conservation objectives are drawn from Natural England's website and are only available for SACs and SPAs **[See reference 27]**

North Meadow and Clattinger Farm SAC

Overview of site and its location

C.2 North Meadow & Clattinger Farm Meadows SAC consists of a series of traditionally managed unimproved grasslands within the floodplain of the Upper Thames which continue to be managed as pasture and as hay meadow.

C.3 It contains a rich variety of species-rich grassland types including the rare MG4 community for which the SAC is designated as well as a number of notable plant species. These grasslands represent rare and scattered remnants of a much more widespread unimproved grassland habitat before agricultural intensification and extensive gravel quarrying locally were responsible for widespread losses of this habitat and its subsequent fragmentation.

Qualifying features

C.4 Annex I habitats that are a primary reason for selection of this site:

- Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis)

Conservation objectives

C.5 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats;
- The structure and function (including typical species) of qualifying natural habitats; and
- The supporting processes on which qualifying natural habitats rely.

Key Vulnerabilities

C.6 Inappropriate Water Levels: An effective WLMP needs to be in place in order to protect the integrity of the site. There have been several unseasonal floods over the last six years which are beginning to cause changes and losses in the vegetation communities on the site.

C.7 Water Pollution: Both sediment and nutrient input are of concern. A diffuse pollution plan is in place and catchment sensitive farming initiative covers the catchment. Diffuse pollution has the potential to affect aquatic habitats and species as well as habitat quality in areas of riverside habitat supporting Vertigo moulinsiana. Diffuse pollution is arising from highway runoff as well as from farmland. Pollution also results from overflowing sewers (a result of high groundwater levels infiltrating sewers) with ongoing/recurring incidents at numerous locations on the River Lambourn.

C.8 Habitat Fragmentation: The two component SSSIs are located 8km apart. Inclusion and restoration of a number of intervening sites locally would increase the habitat, thereby making it more resilient to fluctuating water levels in the face of climate change. The NNR team at North Meadow has, over a number of years, been working to achieve this aim. Also, one option is that additional land should be included within the North Meadow SSSI for this purpose. This would help buffer the site, possibly provide space for adaptation in anticipation of the

effects of climate change, and better manage visitor impacts. Clattinger forms part of a more extensive site which provides good opportunities for on-site management.

C.9 Commons Management: Fencing is required to keep livestock from straying off site. North Meadow NNR is common land and it is the responsibility of neighbouring landowners to erect fences. There are a number of problems involved in achieving this.

C.10 Public Access/Disturbance: There is increasing visitor pressure especially during the flowering time of Snake's-head Fritillary leading to localised damage on sites in the SAC.

C.11 Water Pollution: The SAC's hay meadow vegetation communities are sensitive to elevated nutrient levels. With increasing flooding there is an increased risk of flood water carrying diffuse pollution onto the site and causing soil enrichment with negative consequences for the species richness of the meadows. For this Annex I feature, the deposition of nutrients, particularly phosphate (‘P’), as sediment in floodwaters have the potential to impact the site,

C.12 Conservation Measures: Active and ongoing conservation management is needed to protect, maintain or restore hay meadow vegetation. Conservation measures for hay meadow vegetation will typically include grazing, cutting, scrub management, weed control, recreation/visitor management. Also covered is maintenance of surface drainage features and retention of suitable land use infrastructure/patterns to enable site management.

C.13 Air Quality: Hay meadows is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it. There are critical levels for ammonia (NH3), oxides of nitrogen (NOx) and sulphur dioxide (SO2), and critical loads for nutrient nitrogen deposition and acid deposition. There are currently no critical loads or levels for other pollutants such as Halogens, Heavy Metals, POPs, VOCs or

Dusts. Ground level ozone is regionally important as a toxic air pollutant but flux-based critical levels for the protection of semi-natural habitats are still under development. Overall nitrogen deposition, which includes ammonia, at both sites currently falls just below the critical loading for the habitat present. North Meadow is adjacent to the A419 trunk road and on the outskirts of the market town of Cricklade whilst Clattinger Farm is in a more rural location, further from potential sources of pollution.

C.14 Adaptation and resilience: Such environmental changes may include changes in sea levels, precipitation and temperature for example, which are likely to affect the extent, distribution, composition and functioning of a feature within a site. The vulnerability and response of features to such changes will vary. The overall vulnerability of this particular SAC to climate change is high. This SAC is on two locations, 4.5 miles apart. This current fragmentation means that neither site is able to support the other through buffering and connectivity. Both sites have potential, associated restoration opportunities which could help to buffer the feature. Climate change may bring differing challenges at both sites. Since the early 2000's North Meadow has been subject to prolonged and often unseasonal periods of flooding which has brought shifts towards wetter, less species-rich plant communities. Clattinger Farm has experienced less prolonged and large scale flooding and may in the future suffer from lack of water as the adjacent Swill Brook regularly dries up in the summer months.

C.15 Functional connectivity with wider landscape: Increasing actual and functional landscape-scale connectivity would be beneficial. The agricultural drainage ditch network associated with both sites has fallen out of regular maintenance. Regular ditch maintenance has been re-instated on North Meadow through the management of the NNR and also across some of Clattinger Farm by the owner. However, the drainage of both sites, particularly North Meadow, rely on properly functioning agricultural drainage ditches beyond the control of the site owners on third party land. It will be necessary to re-instate regular maintenance on ditches downstream of both sites to restore functional connectivity to the wider landscape and help maintain the Hay meadows.

C.16 Hydrology: Flooding Regime: Hay meadows are strongly dependent on moist, but not waterlogged, soils on floodplains. Changes in source, depth, duration, frequency, magnitude and timing of water supply can have significant implications for the assemblage of characteristic plants present. Too much inundation can result in a shift from H6510 to other vegetation types (such as inundation grassland, swamps); too little flooding may compromise the necessary conservation/agricultural management due to reduced nutrient inputs which will reduce hay yields, making hay management less viable and sustainable.

C.17 Hydrology: Water Table: Hay meadows is strongly dependent on moist, but not waterlogged, soils on floodplains. Changes in source, depth, duration, frequency, magnitude and timing of water supply can have significant implications for the assemblage of characteristic plants and animals present.

C.18 Soils, substrate and nutrient cycling: Changes to natural soil properties may therefore affect the ecological structure, function and processes associated with this Annex I feature. Prolonged periods of flooding at North Meadow since 2007 have significantly increased the soil P index to as much as index 3 in some years.

C.19 Vegetation community transitions: Transitions/zonations between adjacent but different vegetation communities are usually related to naturally-occurring changes in soil, aspect or slope. Such 'ecotones' retain characteristics of each bordering community and can add value in often containing species not found in the adjacent communities. Retaining such transitions can provide further diversity to the habitat feature, and support additional flora and fauna.

C.20 Vegetation: undesirable species: Undesirable non-woody and woody vascular plants species may require active management to avert an unwanted succession to a different and less desirable state. Often they may be indicative of a negative trend relating to another aspect of a site's structure and function. These species will vary depending on the nature of the particular feature, and in some cases these species may be natural/acceptable components or even dominants.

C.21 Vegetation community composition: This habitat feature will comprise a number of associated semi-natural vegetation types and their transitional zones, reflecting the geographical location of the site, altitude, aspect, soil conditions (especially base-status and drainage) and vegetation management. Maintaining or restoring these characteristic and distinctive vegetation types, and the range of types as appropriate, will be important to sustaining the overall habitat feature. This will also help to conserve their typical plant species, and therefore that of the SAC feature, at appropriate levels.

C.22 Key structural, influential and distinctive species: Some plant or animal species (or related groups of such species) make a particularly important contribution to the necessary structure, function and/or quality of an Annex I habitat feature at a particular site. There may be natural fluctuations in the frequency and cover of each of these species. The relative contribution made by them to the overall ecological integrity of a site may vary.

C.23 Spatial distribution of the feature within the site: A contraction in the range, or geographic spread, of the feature (and its component vegetation and typical species, plus transitional communities) across the site will reduce its overall area, the local diversity and variations in its structure and composition, and may undermine its resilience to adapt to future environmental changes. Fragmentation can impact on their viability and the wider ecological composition of the Annex I habitat. Smaller fragments of habitat can typically support smaller and more isolated populations which are more vulnerable to extinction. These conditions may not be suitable for some of the typical and more specialist species associated with the Annex I habitat feature.

C.24 Extent of the feature within the site: For Hay meadows, there will be year to year fluctuations in climate resulting in variable flooding regimes. A series of summer floods at North Meadow have caused a decline in the area of MG4 grassland, which corresponds to H6510. Excessive and unseasonal flooding presents the most significant risk to Hay meadows at North Meadow.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

C.25 The qualifying habitats rely upon soil quality and water quality/quantity.

Cotswold Beechwoods SAC

Overview of site and its location

C.26 The Cotswold Beechwoods represent the most westerly extensive blocks of *Asperulo-Fagetum* beech forests in the UK. The woods are floristically richer than the Chilterns, and rare plants include red helleborine *Cephalanthera rubra*, stinking hellebore *Helleborus foetidus*, narrow-lipped helleborine *Epipactis leptochila* and wood barley *Hordelymus europaeus*. There is a rich mollusc fauna. The woods are structurally varied, including blocks of high forest and some areas of remnant beech coppice.

Qualifying features

C.27 Annex I habitats that are a primary reason for selection of this site:

- *Asperulo-Fagetum* beech forests

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)

Conservation objectives

C.28 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats;
- The structure and function (including typical species) of qualifying natural habitats; and
- The supporting processes on which qualifying natural habitats rely.

Key Vulnerabilities

C.29 Invasive Species: The dumping of garden waste and the consequent spread of invasive plants is an on-going threat. The spread of the non-native sycamore provides a challenge and has made particular use of canopy gaps created by storm damage. Although sycamore is considered an acceptable component of woodlands, including beechwoods, on the continent, in the Cotswold it tends to dominate understorey and canopy to the detriment of other (native) tree species.

C.30 Deer: Deer browsing of regenerating trees (and possibly ground flora) remains a major threat to favourable condition throughout the beechwoods.

C.31 Invasive Species: Grey squirrel numbers have increased sharply over the past decade or so and now cause significant damage to tree species, in particular beech. In places, this can lead to pole stage beech being systematically ring barked and killed.

C.32 Disease: Although not known to be present in the Cotswold as yet, Chalara (ash disease) is a major future threat to the beechwoods.

C.33 Public Access/Disturbance: A particular increase has been the use of mountain bikes and horse-riding which use the woods far beyond the limited network of bridleways. This has created numerous additional trackways and so increasing the erosion of the ground flora and potentially opportunities for water erosion. Although the routes away from bridleways are not usually permitted, much of the SAC woodland is NNR or has public access by foot. Additionally, dog walking has increased within the SAC especially at Coopers Hill where car parking is available. This has become a particular issue where professional dog walkers release large numbers of dogs (up to 12) to run uncontrolled through the woods. This causes disturbance to wildlife as well as local nutrification through dog faeces.

C.34 Changes in Species Distributions: There is a risk that global warming will increase the risk of drought to beech trees (which are shallow rooted).

C.35 Air Pollution: impact of atmospheric nitrogen deposition – Nitrogen deposition exceeds site relevant critical loads. High atmospheric nitrogen levels could affect the SAC features through: changes in ground vegetation and mycorrhiza; nutrient imbalance; changes to soil fauna; increase in tall grasses; decline in diversity; increased mineralization; N leaching; or surface acidification. There are critical levels for ammonia (NH3), oxides of nitrogen (NOx) and sulphur dioxide (SO2), and critical loads for nutrient nitrogen deposition and acid deposition. There are currently no critical loads or levels for other pollutants such as Halogens, Heavy Metals, POPs, VOCs or Dusts. The levels of Nitrogen and Acid deposition are currently exceeding the critical loads for this habitat.

C.36 Extent of the feature within the site: There should be no measurable reduction (excluding any trivial loss) in the extent and area of beech forests. Restoration of plantation on ancient woodland is ongoing and will take some time before it is assignable to an Annex 1 habitat type. There is some scope to increase the extent of the SAC feature through plantation restoration but also scope to increase the quality (as the secondary woodland improves). Loss of any woodland area which fragments a site into different parts may interrupt the movement of species between the remaining parts of the woodland, especially those with limited powers of dispersal.

C.37 Spatial distribution of the feature within the site: A contraction in the range, or geographic spread, of beech forest, dry grassland and scrublands across the site will reduce its overall area, the local diversity and variations in its structure and composition, and may undermine its resilience to adapt to future environmental changes. This may also reduce and break up the continuity of a habitat within a site and how well its typical species are able to move around the site to occupy and use habitat. Fragmentation can impact on their viability and the wider ecological composition of the Annex I habitat. Conditions may not be suitable for some of the typical and more specialist species associated with the Annex I habitat feature.

C.38 Vegetation community composition: Beech forests, dry grasslands and scrublands will comprise a number of associated semi-natural vegetation types and their transitional zones, reflecting the geographical location of the site, altitude, aspect, soil conditions (especially base-status and drainage) and vegetation management. Maintaining or restoring these characteristic and distinctive vegetation types, and the range of types as appropriate, will be important to sustaining the overall habitat feature.

C.39 Woodland canopy cover: Woodland canopy density and structure is important because it affects ecosystem function and in particular microclimate, litterfall, soil moisture, nutrient turnover and shading; this in turn influences the composition of plants and animals in lower vegetation layers and soil. The woodland canopy of this feature should provide a core of woodland interior conditions with some open and edge habitat as well.

C.40 Open Space: Having some open, sunlit and largely tree-less areas as part of the woodland community is often important to facilitate natural tree and shrub regeneration and also to provide supporting habitat for specialist woodland invertebrates, birds, vascular and lower plants. This SAC currently contains good sized areas of permanent open space/rides (in SSSI units 12 and 15 of the SAC), however, other units would benefit from more open space and thinning.

C.41 Old growth: For this habitat type, old or over-mature elements of the woodland are particularly characteristic and important features, and their continuity should be a priority. Due to the historic management on this SAC some areas have few or no veteran trees. Maintain veterans at suitable frequency whether they exist and to develop trees to over-maturity and death in those units where ancient/veteran trees are currently lacking.

C.42 Dead and decaying wood: Due to the historic management and existing commoners rights of estover, the targets vary across the site, however, in some of the underpinning SSSI units one of the components causes of failing to achieve favourable condition, is a lack of deadwood.

C.43 Tree age class distribution: Appropriate age structure is affected by a lack of younger trees in some of the underpinning SSSI units and the historic management limits the largest age class in other units.

C.44 Woodland edge (graduated edge; buffered; mosaics with other habitats): Woodland structure plays a critical role in woodland ecosystem functioning. Scrub is an important component of the transition from the woodland into the surrounding unimproved calcareous grassland commons adjacent to areas of this SAC. A number of priority butterfly species rely on the graduated transition such as Duke of Burgundy. Scrub requires ongoing management to prevent it encroaching excessively onto the Grassland habitat and progressing into secondary woodland.

C.45 Species diversity: Sycamore is invasive at this site and in areas where sycamore is present, up to 15% Sycamore is acceptable in the understorey and up to 5% in the canopy on the basis that these are not seed bearing.

C.46 Supporting off-site habitat: Changes in surrounding land-use may adversely (directly/indirectly) affect the functioning of the feature and its component species. This supporting habitat may be critical to the typical species of the feature to support its population dynamics ('metapopulations'), pollination or to prevent/reduce/absorb damaging impacts from adjacent land uses e.g. pesticide drift, nutrient enrichment.

C.47 Browsing and grazing by herbivores: In some areas of the site, deer browsing is heavier than target levels and causes the failure in favourable condition of some underpinning SSSI units. Squirrel damage is also impacting tree regeneration as they tend to target young trees (8-10 year growth), ring barking them and causing their death.

C.48 Regeneration potential: High levels of deer browsing are currently preventing sufficient regeneration in some locations, as is the impact of squirrels.

C.49 Tree and shrub species composition: High densities of sycamore currently result in unfavourable condition at some locations within this SAC. Whilst it is appropriate for beech to be the most prominent tree across the SAC feature, a diversity of native tree and scrub species is to be encouraged both to support the associated fauna and flora and to retain resilience from the threat of tree diseases.

C.50 Key structural, influential and/or distinctive species: Some plant or animal species (or related groups of such species) make a particularly important contribution to the structure, function and/or quality of an Annex I habitat feature at a particular site.

C.51 Undesirable species: These include invasive non-natives such as periwinkle or coarse and aggressive native species e.g. sycamore which may uncharacteristically dominate the composition of the feature. These may also include invasive non-natives such as Cotoneaster species or coarse and aggressive native species which may uncharacteristically dominate the composition of the feature. The named Invasive species were chosen to indicate problems of eutrophication and disturbance from various sources when outside target e.g. poaching, stock feeding.

C.52 Soils, substrate and nutrient cycling: Changes to natural soil properties may therefore affect the ecological structure, function and processes associated with this Annex I feature.

C.53 Root zones of ancient trees: Unless carefully managed, activities such as construction, forestry management and trampling by grazing livestock and human feet during recreational activity may all contribute to excessive soil compaction around ancient trees. Recreational pressure including walking and mountain biking can be an issue in this SAC.

C.54 Hydrology: Changes in source, depth, duration, frequency, magnitude and timing of water supply can have significant implications for the assemblage of characteristic plants and animals present. Currently there are no large abstractions within 3 km of the site. The vulnerability of the site to groundwater abstraction is low. When deciding future groundwater applications consideration should be given to protecting the spring flow and base-flow of the Painswick Stream system. Wet flush features forming part of the H9130 feature are important for the assemblage of rare woodland snails as well as tufa deposits.

C.55 Illumination: Flowering and development of trees and plants can also be modified by un-natural illumination which can disrupt natural seasonal responses. Old mine/cave structures below the SAC are used by greater and lesser horseshoe bats which are typical of this habitat type and particularly sensitive to artificial light levels. Other bats species also use the woodland.

C.56 Extent of the feature within the site: There should be no measurable reduction (excluding any trivial loss) in the extent and area of dry grasslands and scrubland, and in some cases, the full extent of the feature may need to be restored. This feature is susceptible to natural dynamic processes, there may be acceptable variations in its extent through natural fluctuations. As these grassland areas are surrounded by woodland, care must be taken that the woodland does not encroach on the extent of the grassland. Scrub is an integral part of the habitat and its location can vary, but it should be managed so that it does not smother the grassland and progress into secondary woodland.

C.57 Abundance of herbaceous species: A low proportion of grassland herbs can indicate eutrophication, usually from fertilisers, or insufficient removal of biomass, leading to dominance by grasses.

C.58 Vegetation community transitions: Transitions/zonations between adjacent but different vegetation communities are usually related to naturally-occurring changes in soil, aspect or slope. Such 'ecotones' retain characteristics of each bordering community and can add value in often containing species not found in the adjacent communities. Retaining such transitions can provide further diversity to the H6210 habitat feature, and support additional flora and fauna.

C.59 Supporting off-site habitat: Increasing actual and functional landscape-scale connectivity would be beneficial. Changes in surrounding land-use may adversely (directly/indirectly) affect the functioning of the feature and its component species. This supporting habitat may be critical to the typical species of the feature to support their feeding, breeding, population dynamics ('metapopulations'), pollination or to prevent/reduce/absorb damaging impacts from adjacent land uses e.g. pesticide drift, nutrient enrichment. In some locations the connectivity is good, however, other stretches of the scarp would benefit from appropriate management of grassland and woodland rides and glades to improve the linkages of the network.

C.60 Adaptation and resilience: It is currently considered that the sensitivity of unimproved calcareous grassland to climate change at this SAC is low. Older established grasslands being more resilient to those in the earlier stages of succession. Any necessary or likely adaptation or adjustment by the feature and its management in response to actual or expected climatic change should be allowed for, as far as practicable, in order to ensure the feature's long-term viability.

C.61 Air quality: Dry grasslands and scrublands is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it. There are critical levels for ammonia (NH3), oxides of nitrogen (NOx) and sulphur dioxide (SO2), and critical loads for nutrient nitrogen deposition and acid deposition. Concentrations are currently within maximum limits set for this habitat. There are currently no critical loads or

levels for other pollutants such as Halogens, Heavy Metals, POPs, VOCs or Dusts.

C.62 Conservation measures: Active and ongoing conservation management is needed to protect, maintain or restore this feature at this site.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

C.63 The qualifying habitats rely upon soil quality and water quality/quantity.

Rodborough Common SAC

Overview of site and its location

C.64 Rodborough Common is the most extensive area of semi-natural dry grasslands surviving in the Cotswolds of central southern England, and represents CG5 Bromus erectus – Brachypodium pinnatum grassland, which is more or less confined to the Cotswolds.The site contains a wide range of structural types, ranging from short turf through to scrub margins, although short-turf vegetation is mainly confined to areas of shallower soils.

Qualifying features

C.65 Annex I habitats that are a primary reason for selection of this site

- Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (* important orchid sites)

Conservation objectives

C.66 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitat;
- The structure and function (including typical species) of qualifying natural habitat; and
- The supporting processes on which qualifying natural habitat rely.

Key Vulnerabilities

C.67 Undergrazing - Undergrazing is an issue due to the reliance on the rights of commoners to turn out cattle. The number of stock have dropped over the years to the point that additional cattle now need to be electric fenced on to the most species-rich areas on the slopes. It is the lower slopes that are the most species-rich and are suffering from a lack of grazing.

C.68 Public Access/Disturbance - The common is very close to Stroud and recreational use has greatly increased over the past few decades. This has created many new paths and parking areas which cause soil compaction to the detriment of the surrounding sward. Dog faeces is a particular issue which also damages the sward . New and proposed housing continues to add to the problem.

C.69 Air Pollution: risk of atmospheric nitrogen deposition - Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features are currently considered to be in favourable condition on the site.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

C.70 The qualifying habitats rely upon soil quality and water quality/quantity

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Cirencester Neighbourhood Plan

SEA Screening Opinion

Cotswold District Council

Final report

Prepared by LUC

October 2022

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1	Draft SEA Screening Report	K Nicholls	K Nicholls	K Nicholls	18.10.2022
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Chapter 1
Introduction

1.1 Cirencester Town Council is supporting the preparation of a Neighbourhood Plan, which is being prepared by a steering group comprising local people on behalf of the Town Council. The town of Cirencester is located within Cotswold District and includes part of the Cotswold National Landscape (formerly called the Cotswold Area of Outstanding Natural Beauty). The emerging Neighbourhood Plan covers the full extent of the electoral boundary of the Town Council, which includes eight wards of New Mills, Abbey, Watermoor, Chesterton, St Michael's, Stratton, Four Acres and the Beeches.

1.2 LUC has been appointed by Cotswold District Council to consider whether there is a need for Strategic Environmental Assessment (SEA) to be undertaken for the Neighbourhood Plan. SEA may be required for a Neighbourhood Plan if it is likely to have significant environmental effects. Sustainability Appraisal (SA) is similar to SEA but includes assessment of the likely significant effects of a plan or programme on economic and social factors, as well as environmental factors. Planning Practice Guidance (PPG) **[See reference 1]** clarifies that there is no legal requirement for a neighbourhood plan to be subject to SA, but that SA can be used to demonstrate how the plan will contribute to sustainable development.

1.3 Cotswold District Council has commissioned LUC to carry out SEA Screening of the Pre-Submission Draft Cirencester Neighbourhood Plan (September 2022) in order to determine whether an assessment is required under European Directive 2001/42/EC (the SEA Directive), transposed into UK law through the SEA Regulations **[See reference 2]**.

Chapter 2

SEA Screening

Scope of the Cirencester Neighbourhood Plan

2.1 In October 2018, Cirencester Town Council approached Cotswold District Council to have the electoral boundary designated as a neighbourhood area, so the Town Council could develop a Neighbourhood Plan. A Steering Group, made up of volunteers from the community and members of the Cirencester Town Council, has been involved in producing the current version of the Cirencester Neighbourhood Plan, the Pre-Submission (Regulation 14) Draft.

2.2 The Neighbourhood Plan covers the entire electoral boundary of Cirencester Town Council, which includes eight wards. The Pre-Submission Draft Neighbourhood Plan includes a vision for the long-term future of Cirencester along with 13 objectives:

1. Maintain, protect, and enhance the distinctive Cotswold-rich visual character, views and heritage of Cirencester, its immediate historic setting and vistas and its connections to the surrounding areas.

2. Require all new development to contribute to the 20 Minute Neighbourhood model of development through the creation of safe, sustainable, liveable, and mixed communities with active transport to jobs and essential services to meet the daily needs of the community.

3. Create a robust yet flexible network of streets and shared spaces that promote all modes of active travel leading to reduced reliance on private vehicles. To support this, there is a need for enhanced public transport and a mobility hub.

4. More effectively integrate the outlying residential areas (e.g., Kingshill, Kingsmeadow, Stratton, Chesterton) by foot, cycle, and public transport to the town centre, which are currently hindered by highway barriers and footpath gaps. The key barrier is that created by the A419 and A429 road system which wraps around Cirencester town centre, frustrating easy access to the middle from outlying residential areas and safe links to the surrounding countryside.

5. Facilitate a reduction in carbon emissions and contribute to achieving the national goal of Net Zero by adopting and implementing the relevant recommendations.

6. Protect, maintain, and enhance the natural environment, including local green spaces, parks, trees and green buffers, habitats, the River Churn, Gumstool Brook and all wildlife corridors alongside their connection to the wider landscape, promoting biodiversity and planting native species where possible.

7. Improve the sustainability of new build development through use of low carbon materials, construction methods and facilitate low carbon running carbon costs in accordance with the Cotswold Design Code.

8. Ensure that land made available for new developments better facilitates and maintains a vibrant connected, economically active, and sustainable Town Centre without adding to congestion or flood-risk.

9. Prioritise new residential development towards affordable homes and first time buyers and avoid age-specific residences.

10. Minimise future flood risk by protecting and, where possible, extending the functional floodplain. Require new developments to provide multifunctional mitigation measures, such as sustainable urban drainage systems, to ensure that rainwater is attenuated within the site. Support solutions to improve the management of the river flow on the upper Churn to reduce flooding and drying up.

11. Protect existing, and deliver new easily accessible, community infrastructure, including for primary health care, skills development, recreation, sport, leisure, and cultural enrichment, to fill existing gaps and support the future of Cirencester and its population growth.

12. Facilitate a reduction in noise and light pollution within the town and in new development whilst maintaining and improving air quality through a reduction in emissions.

13. Support skills development for local people.

2.3 The Neighbourhood Plan sets out 33 planning policies to realise and deliver the vision for Cirencester. These policies are contained within the following policy chapters: Access and Movement, Design and Built Environment, Quality of the Public Realm, Local Economy, Natural Environment and Wellbeing and Community.

2.4 No sites have been allocated for development within the Neighbourhood Plan, although various policies include criteria that will apply to any proposals for development. Policy DBE4 supports the provision of affordable housing integrated within residential developments, while Policy DBE5 requires that new developments include mechanisms to restrict the ownership and occupancy as a principal residence. Policy DBE3 requires new development to be designed to respond positively to the Cotswold vernacular and to the distinctive Cirencester context.

2.5 Other policies in the Neighbourhood Plan address a range of topics including the natural environment, green infrastructure, transport, heritage and the economy. Together these policies seek to ensure that new development in Cirencester is high quality and sensitively designed so as not to have adverse impacts on the surroundings and that it contributes positively to the public realm.

2.6 The final part of the Neighbourhood Plan lists Neighbourhood Plan Projects which are set out under the same categories as the policies.

Baseline Information

2.7 This section summarises baseline information for the town of Cirencester, drawing from the information set out in the Pre-Submission (Regulation 14) Draft Neighbourhood Plan.

Context

2.8 The town of Cirencester is located within Cotswold District and includes part of the Cotswold National Landscape. The Town Council electoral boundary, which the Neighbourhood Plan covers, includes eight wards: New Mills, Abbey, Watermoor, Chesterton, St Michael's, Stratton, Four Acres and the Beeches.

Biodiversity, Flora and Fauna

2.9 There are no Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites within Cirencester, the closest being North Meadow and Clattinger Farm SAC approximately 5.5km to the south, Cotswold Beechwoods SAC approximately 8.5km to the north west and Rodborough Common SAC approximately 10km to the west. Cotswold Water Park Site of Special Scientific Interest (SSSI) is 1.4km to the south and is in favourable condition, Daneway Banks SSSI lies 2km to the west of the Cirencester boundary and is in favourable condition, while Barnsley Warren SSSI is 2.8km to the north east and is in both favourable (60%) and unfavourable recovering (40%) condition.

2.10 Within Cotswold District as a whole there are over 260 locally designated Key Wildlife Sites.

Population

2.11 In 2018, Cirencester had a population of approximately 20,780 people. The town has a higher than average population of elderly people, with 22.1% of people being over the age of 65 compared to 18% nationally. The number of people aged 0-15 is lower than nationally, at 16.3% compared to 19.1% across England.

Human Health

2.12 The majority of Cirencester's residents are in good or very good health (82.9%) with a small proportion (4.1%) in bad to very bad health. Information from the 2011 Census indicates that the proportion of the Cirencester population that is in very good health (47.6%) is slightly lower than the Cotswold average (48.8%) but very slightly higher the England average (47.2%).

2.13 Cirencester has an ageing population which is likely to lead to more cases of residents suffering from age-related conditions such as dementia.

Soil

2.14 Around Cirencester town the land is classified as urban. Most of the rest of the plan area comprises Grade 3 agricultural land with small areas of Grade 2 agricultural land in the south, and a larger area of non-agricultural land in the west. It is not known whether the Grade 3 land comprises Grade 3a which is classed as high quality, or the lower quality Grade 3b.

2.15 The soil type in and around Cirencester is primarily shallow lime-rich soils over chalk or limestone.

Water

2.16 While the majority of the plan area is at very low risk of fluvial and surface water flooding, there are areas of flood zone 3 associated with the River Churn, which the town of Cirencester lies on the bank of. The areas of flood zone 3 cover extensive areas at Stratton meadow, Kingsmeadow, and alongside the inner bypass, effectively separating the main part of the town from Beeches, Kingshill, Bowling Green and Stratton and acting as a significant constraint to development. In the face of climate change, the risk of further surface water drainage problems is likely to increase.

Air and Climatic Factors

2.17 Air Quality in the Cotswold Area is generally very good. There are two Air Quality Management Areas (AQMA) within Cotswold District at Birdlip and Lechlade, both of which are approximately 15km from Cirencester. There are no AQMAs within Cirencester. Air quality monitoring, using a network of diffusion tubes to measure nitrogen dioxide (NO_2) levels, is undertaken throughout the District. The District's air quality monitoring shows that NO_2 levels during 2020 were below the National Air Quality Objective in all locations.

2.18 Climate data is not available at ward level, but within Cotswold District as a whole, reductions in overall carbon emissions of 30.3% were achieved between 2005 and 2019. This reduction is mostly due to progress in reducing emissions from domestic, followed by industry and commercial with minimal progress on public sector and transport. Transport makes the largest contribution to carbon emissions in Cotswold District.

Material Assets

2.19 Cirencester is well connected by road to its locality by the key routes of the A417 and the A429 that skirt the main settlement and run diagonally north to

south. Cirencester itself is not accessible by train, with the nearest station being at Kemble, around five miles away.

2.20 The town centre of Cirencester is characterised by a variety of shops from national retail chains to quaint independent stores that contribute to the town's character. The town centre comprises a number of different areas including Market Place which has recently been renovated to include a dedicated market space, the streets of Cricklade Street, Dyer Street and Castle Street that offer a range of retail stores, courtyard areas at The Old Post Office and a sheltered undercover area along Bishops Walk. The town centre has been facing pressures not only due to the Covid-19 pandemic but also due to competition from online shopping and its impacts on the high street.

2.21 Due to its historic environment, tourism is a major and growing part of Cirencester's local economy. However, if not properly managed, it could have adverse impacts on the environment and the daily life of local people.

2.22 Due mainly to Cirencester's popularity with tourists, the town has high second homes rates, with the Cotswold District having one of the highest rates of empty houses in England. There were 3,776 houses and flats in the District classed as second homes for council tax purposes as of October 2021. This means one in every 18 homes in Cotswold District were out of use. This issue is contributing to a lack of housing in Cirencester and creating pressure for new development sites to be built out to meet the local housing need.

Landscape

2.23 Wrapping around the northern and western edges of Cirencester is the Cotswold National Landscape (formally called the Area of Outstanding Natural Beauty, or AONB).

2.24 Cirencester falls within National Character Area 107: Cotswolds. The Cotswolds landscape consists of a steep slopes crowned by high, open uncultivated land with increasingly wooded valleys.

Cultural Heritage

2.25 Much of Cirencester is covered by four large Conservation Areas which act to protect many centuries of historic development within the town centre, around Cirencester Park, the Gloucester street and river walk, and to the south of the town.

2.26 Within the Cirencester Town Centre Conservation Area there are 179 listed buildings, two of which are Grade I listed, alongside nine grade II* listings and 168 Grade II listings. Cirencester Park, an impressive swathe of Grade I historic parkland, also lies to the west of the town.

SEA Screening

2.27 An assessment has been undertaken to determine whether the Pre-Submission (Regulation 14) Draft Cirencester Neighbourhood Plan (September 2022) requires SEA in accordance with the SEA Regulations.

2.28 Figure 2.1 overleaf presents the flow diagram entitled 'Application of the SEA Directive to plans and programmes' which is taken from the Practical Guide to the Strategic Environmental Assessment Directive, published in September 2005. This is a useful guide when considering whether a plan should be subject to SEA (The Practical Guide has been superseded by the National Planning Practice Guidance; however it still provides a useful and relevant guide to the process to use in making SEA screening decisions).

Figure 2.1: Application of the SEA Directive to Plans and Programmes

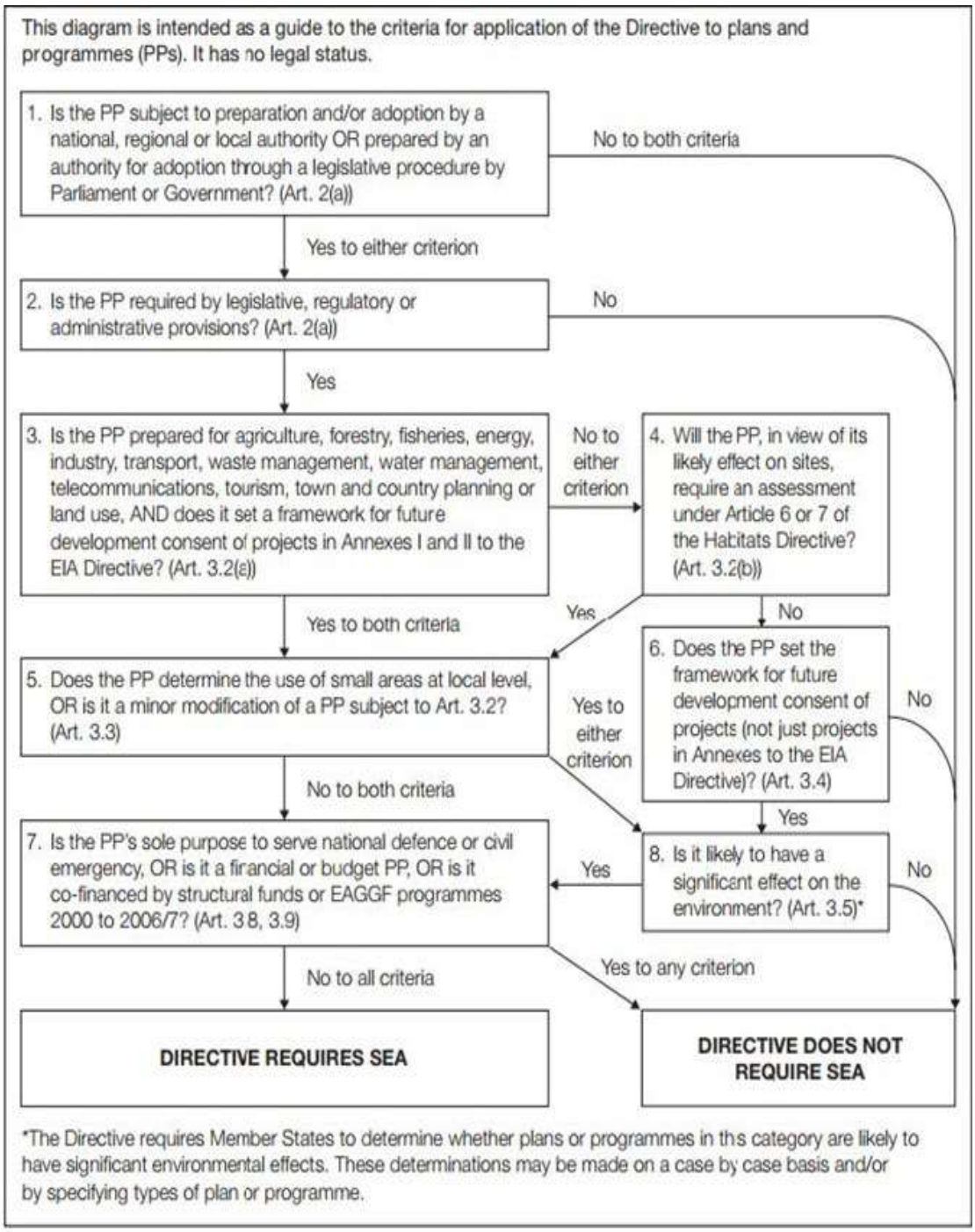

Table 2.1: Application of SEA Directive to the Cirencester Neighbourhood Plan

Stage	Yes/No	Reason
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Yes	The Cirencester Neighbourhood Plan is being prepared under the Localism Act 2011 and will be adopted ('made') by the Local Authority (Cotswold District Council) as part of the statutory development plan. **Move to Q2.**
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	The Cirencester Neighbourhood Plan is being prepared under the Localism Act 2011 and in accordance with the Neighbourhood Planning (General) Regulations 2012. However, there is no requirement to produce a Neighbourhood Plan; it is an optional plan. Once made it will become part of the statutory development plan. Therefore, it should continue to be screened. **Move to Q3.**
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Yes and No	The Cirencester Neighbourhood Plan is being prepared for town and country planning and land use, but it does not set a framework for future development consent of projects in Annexes I and II to the EIA Directive. **Move to Q4.**

Stage	Yes/No	Reason
4.Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	No	HRA screening of the Cirencester Neighbourhood Plan has identified that there are no likely significant effects on European sites and an Appropriate Assessment is not required. **No: Move to Q6.**
6.Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)	Yes and No	The Cirencester Neighbourhood Plan does not allocate sites for development; however it includes policies against which proposals for development within the plan area will be assessed. **Move to Q8.**
8.Is it likely to have a significant effect on the environment? (Art. 3.5)	No	See Table 2.2. **SEA IS NOT REQUIRED**

Table 2.2: Likely Significant Effects

SEA Requirement	Comments
The characteristics of the plans and programmes, having regard, in particular, to:	
1. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	Once made, the Cirencester Neighbourhood Plan will become part of the statutory development plan and will guide the delivery of development in Cirencester, including in terms of design. The Cirencester Neighbourhood Plan does not allocate sites for residential or other forms of development. The Cotswold District Local Plan 2011-2031 (adopted in August 2018) identifies Cirencester as the main focus for development and allocates new development sites in Cirencester through

SEA Requirement	Comments
	Policy S1. These include two housing development sites, eight established employment sites, four mixed use development sites and a car parking site. A strategic site South of Chesterton, Cirencester, is also allocated through Policy S2 for up to 2,350 dwellings and around 9.1ha of employment land. The adopted Local Plan set the District's housing requirement to be 8,400 dwellings for the Plan period (2011 to 2031), an average of 420 dwellings a year. Since the Local Plan has been adopted the housing need has to be reassessed every five years based on national policy. The housing need is now 490 dwellings per annum. There is currently an insufficient housing land supply to deliver 490 dwellings a year between 2023 and 2031. It is currently estimated that this increase would require the allocation of sites capable of delivering around 700 to 900 additional dwellings by 2031. The emerging Cotswold District Local Plan Partial Update Regulation 18 'Issues and Options' was consulted on between 4th February and 20th March 2022. It is at an early stage in its preparation and does not yet set out information about housing figures.
2. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The Cirencester Neighbourhood Plan has to be in general conformity with the local strategic framework (the adopted Cotswold District Local Plan 2011-2031 (2018) and the emerging Cotswold District Local Plan Partial Update). The Cirencester Neighbourhood Plan must also have regard to the National Planning Policy Framework. The Cirencester Neighbourhood Plan does not have influence over other plans. Once made, the Cirencester Neighbourhood Plan will form part of the statutory development plan for Cirencester and will be used in conjunction with the emerging Cotswold District Local Plan Partial Update (once adopted) and the adopted Cotswold District

SEA Requirement	Comments
	Local Plan 2011-2031 to determine planning applications.
3. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	One of the Basic Conditions which the Neighbourhood Plan must meet is to contribute to sustainable development.
4. Environmental problems relevant to the plan or programme.	Baseline information relating to Cirencester was described earlier in this chapter. Key issues of relevance to the Neighbourhood Plan are the presence of the Cotswold National Landscape within part of the plan area, local biodiversity assets and the variety of designated heritage assets.
5. The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	N/A
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:	
6. The probability, duration, frequency and reversibility of the effects.	The Cirencester Neighbourhood Plan does not allocate sites for housing or other forms of development. The Cirencester Neighbourhood Plan covers the period up to 2033. Effects of the Cirencester Neighbourhood Plan are expected to be indirect (due to not allocating sites) but long-term and permanent.
7. The cumulative nature of the effects.	Cumulative effects could result from the Cirencester Neighbourhood Plan in combination with development that takes place in the surrounding towns and villages, although the Cirencester Neighbourhood Plan does not allocate sites for housing or other forms of development. As the emerging Cotswold District Local Plan Partial Update is still in its

SEA Requirement	Comments
	development, it is not yet possible to assess with certainty the amount and location of development that may result from the Plan within and close to Cirencester. The Cotswold District Local Plan 2011-2031 (adopted August 2018) allocates a number of new development sites in Cirencester, as detailed in row 1 above.
8. The transboundary nature of the effects.	The Neighbourhood Plan focuses on Cirencester only. Transboundary effects under the SEA Regulations refers transboundary effects on other EU Member States; therefore they are not relevant to the Neighbourhood Plan.
9. The risks to human health or the environment (e.g. due to accidents).	There are no anticipated risks to human health or the environment from the Cirencester Neighbourhood Plan.
10. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The Cirencester Neighbourhood Plan covers all of Cirencester. The population of the town was estimated to be around 20,780 people as of 2018.
11. The value and vulnerability of the area likely to be affected due to: ■ Special natural characteristics or cultural heritage; ■ Exceeded environmental quality standards or limit values; and ■ Intensive land-use.	Cirencester is bordered by the Cotswold National Landscape. Cotswold Water Park SSSI, Daneway Banks SSSI and Barnsley Warren SSSIs are all within 3km of the plan area. There are numerous designated heritage features within Cirencester.
12. The effects on areas or landscapes which have a recognised national, Community or international protection status.	Cirencester is directly adjacent to and includes parts of the Cotswold National Landscape.

SEA Screening Conclusion

2.29 A screening assessment has been undertaken by applying the criteria from the SEA Directive and Schedule 1 of the SEA Regulations to determine whether or not the Cirencester Neighbourhood Plan is likely to have significant environmental effects when assessed against the topics listed in the SEA Regulations.

2.30 The Cirencester Neighbourhood Plan sets out a vision and detailed planning policies to shape development in the town up to 2033 and decision makers will need to consider the criteria of these policies when determining future applications in the town. However, it does not directly impact on land use through the allocation of sites for housing or other forms of development. While the final part of the Neighbourhood Plan lists Neighbourhood Plan Projects, none of these are allocations for built development.

2.31 On this basis, it is considered that the Cirencester Neighbourhood Plan is unlikely to have significant environmental effects and that full SEA is therefore not required.

Next Steps

2.32 This SEA Screening Report will be sent to the three statutory consultees (Natural England, Historic England and the Environment Agency) and will be reviewed as appropriate in light of any comments received.

LUC

October 2022

References

1 https://www.gov.uk/government/collections/planning-practice-guidance

2 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531). It should be noted that the purpose of the amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the European Union. No substantive changes are made to the way the SEA regime operates.

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Rep #1: Resident

Mark Harrison

From: [redacted]
Sent: 17 April 2026 08:03
To: Neighbourhood Planning
Subject: Feedback on Neighbourhood Plan

[redacted]

An excellent document.
I was most interested in the ' Wheel and Spoke' plans to improve footpaths and cycle routes. Our family regularly cycles or walks into town from Stratton, I am very keen for routes to be improved. It seems to me that the routes up to the RAU, Deer Park and Cirencester College should be a top priority. I regularly cycle up to Parkrun, at the RAU. That event attracts 200-300 people every Saturday and many want to cycle there. The surfaces on Tetbury Hill are dreadful and yet are used daily by so many people.
At the moment, the cycle path from Stratton follows the river. That route, although pretty, has never been a good option on a bike because the river path is narrow and busy with dogwalkers. I regularly push my bike along Gloucester Street until it becomes 2- way. In the past I know that there has been discussion about making that short section of Gloucester Street a Contraflow for cyclists, which would be good. The other alternative is to stay on the main road and turn right opposite Bowling Green Lane - not a nice junction for a cyclist.

I often wish that I could cycle to Abbey Home Farm. It would be great if a route could be extended beyond Hare bushes.

Thanks for all your hard work on this.

[redacted]

REPRESENTATION TO THE CIRENCESTER NEIGHBOURHOOD PLAN
Submission Version (Regulation 16)
[redacted]
Date: 17 April 2026
Plan reference: Cirencester Neighbourhood Plan, Part 1, Reg 16, January 2026

1. Introduction and Summary of Concerns

I am a resident of Cirencester and submit this representation in response to the Regulation 16 consultation on the Cirencester Neighbourhood Plan (Submission Version, January 2026). I have read the plan carefully and wish to raise concerns about its soundness in the following respects.

This representation does not object to neighbourhood planning as a process, nor does it challenge the housing numbers set by the Cotswold District Local Plan, which falls outside the scope of this plan. My concerns relate specifically to the soundness of this plan as submitted: in particular, whether its policies are sufficiently effective and justified given the plan's own evidence base.

The NPPF (paragraphs 35 and 36) requires neighbourhood plans to be sound, meaning they must be: (a) positively prepared; (b) justified; (c) effective; and (d) consistent with national policy. This representation argues that the plan fails the effectiveness test in several material respects, because it acknowledges serious infrastructure deficits and environmental pressures but then adopts policies too weak to address them before or during further development.

Summary of soundness concerns raised in this representation:

1. Infrastructure sequencing: the plan identifies severe capacity deficits in sewerage, healthcare, and transport but does not make further development conditional on their resolution.

2. Flood risk and drainage: the plan acknowledges existing sewer overflow into the River Churn and high groundwater levels but the relevant policies use aspirational rather than mandatory language.

3. Green Gaps policy (NE5): the wording permits loss of undeveloped land between Cirencester and neighbouring settlements through compensation, which undermines the stated protective intent.

4. Cumulative impact: the plan presents evidence of disproportionate recent growth (the Steadings accounting for 95% of population increase since 2011) but contains no policy mechanism to assess or limit further cumulative impact.

2. Cumulative Impact: Disproportionate Recent Growth Without a Policy Response

2.1 The plan's own evidence

Paragraph 2.24 of the plan states that Cirencester is currently providing a quarter of the Cotswold District's allocation of new homes via the Steadings development. The plan's contextual section records that the population rose by approximately 1,000 between 2011 and 2021, with 95% of that increase attributable to the Steadings strategic allocation of more than 2,000 homes.

This is a remarkable concentration of new development. It means that over the last decade, Cirencester has absorbed a major strategic site that has fundamentally altered the scale and character of the town, placing pressure on roads, public transport, schools, GP surgeries, the sewer network, and the River Churn.

2.2 The policy gap

Notwithstanding this evidence, the plan contains no policy that:

- acknowledges the cumulative impact of the Steadings and treats it as relevant context for future decisions;
- sets a threshold or trigger at which further residential growth should be assessed against infrastructure capacity;
- requires a cumulative impact assessment before future planning permissions are granted.

The vision statement (page 4) speaks of "sympathetic, high quality and sustainable economic and residential growth" but provides no mechanism for determining when growth ceases to be sustainable. A plan that acknowledges disproportionate recent growth but provides no policy response to its consequences fails the effectiveness test.

REQUESTED MODIFICATION: Request for modification (no specific policy): New policy on cumulative impact assessment

Current wording:

No such policy currently exists.

Proposed wording:

Before the grant of planning permission for any residential development of 10 or more dwellings, the applicant shall demonstrate, to the satisfaction of the local planning authority, that the cumulative impact of recent residential development in Cirencester (including but not limited to the Steadings strategic allocation) has been assessed in relation to: (a) sewer and water treatment capacity; (b) GP and primary healthcare provision; (c) road network and public transport capacity; (d) school places. Development shall not be permitted where this assessment demonstrates that existing capacity is insufficient and no committed programme for its resolution is in place.

Justification:

The plan's own evidence base identifies pressure across all four of these areas as a direct consequence of recent growth. A plan without a cumulative impact mechanism cannot be effective in managing further growth sustainably.

3. Infrastructure Sequencing: Aspirational Language is Not Effective Policy

3.1 Sewerage and water treatment

Paragraph 10.51 of the plan states in plain terms that "the inadequacy of the current sewer system means that during storms raw sewage is pumped into the river." Paragraph 10.52 states that "even in good weather, the town is at capacity with water treatment" and that Shorncote sewage works already serves a population of 34,000.

This is not a projected future risk. It is a documented existing condition: the sewerage system is already overloaded, and any further development will add to that load.

The policy response to this evidence is found in paragraph 10.53, which states that new developments "should provide additional sewer capacity their building will require."

Soundness concern: ineffective policy wording

The word 'should' is advisory. In planning policy, mandatory requirements use 'must', 'will be required to' or 'shall'. A policy that 'should' require sewer capacity can be set aside by a decision-maker who judges the requirement disproportionate or impractical. Given the plan's own evidence that the system is already at capacity and causing environmental harm (raw sewage in the River Churn), an advisory policy is not effective.

3.2 Healthcare provision

The plan acknowledges that GP surgeries are operating with waiting lists and that there has been no new health provision on any of the new housing developments built since the 1960s (paragraph 2.30). This is a significant admission: 2,000+ homes have been built at the Steadings with no corresponding healthcare infrastructure delivered.

The plan contains no policy that makes future residential development conditional on demonstrated healthcare capacity or committed infrastructure delivery. Section 12 (Wellbeing and Community) addresses community health aspirationally but there is no policy equivalent to a pre-commencement condition requiring healthcare provision to be secured before development proceeds.

3.3 The test of effectiveness

NPPF paragraph 35(c) requires plans to be effective: "the plan should be deliverable over its period and based on effective policies." A policy that encourages infrastructure delivery without making development conditional on it does not meet this test. The Inspector examining this plan will be entitled to ask: if existing capacity is already exceeded, what in this plan prevents further harm from future development?

The answer, as the plan is currently drafted, is: nothing enforceable.

REQUESTED MODIFICATION: Request for modification: Infrastructure sequencing condition

Current wording:

Paragraph 10.53: 'New developments should provide additional sewer capacity their building will require...'

Proposed wording:

New residential developments must demonstrate, prior to the grant of planning permission, that adequate sewer and water treatment capacity exists or will be provided to serve the development without increasing the frequency or volume of sewage discharge into the River Churn or any other watercourse. Where existing capacity is insufficient, development shall not be permitted unless a legally binding agreement is in place with the relevant utility provider for the delivery of necessary infrastructure upgrades prior to first occupation.

Justification:

The plan's own evidence base (paragraphs 10.51 and 10.52) establishes that the existing system is already at or beyond capacity and is causing documented environmental harm. An advisory policy is not effective in these circumstances. The modification aligns with NPPF paragraph 35(c) and the Environment Act 2021.

4. Flood Risk and Drainage: Policy Does Not Match the Severity of the Evidence

4.1 Existing flood vulnerability

Paragraph 2.8 identifies that parts of Cirencester are particularly vulnerable to flooding, citing flood zones covering Stratton Meadow, Kingsmeadow, and areas alongside the inner ring road. The same paragraph notes that sewers serving Chesterton and the Abbey area are inadequate, with foul water entering the River Churn. Paragraph 10.8 records that 2021 flooding events heightened concerns about both sudden heavy rainfall and rising groundwater.

Paragraph 10.54 acknowledges that in much of Cirencester, ground water levels are too high for soakaways to be effective, and states that "development should not take place on flood meadows and should leave an 8m buffer strip to allow for additional capacity."

4.2 Policy NE5: Green Gaps

Policy NE5 (Green Gaps) states: "Proposals that result in the loss of undeveloped land between Cirencester and its neighbouring parishes should compensate for this loss through appropriate replacement landscaped areas."

Soundness concern: Policy NE5 permits what it appears to prevent

The stated purpose of a Green Gaps policy is to prevent coalescence between settlements and protect the character and identity of the town. Policy NE5 as drafted does not prevent the loss of undeveloped land: it permits it, provided compensation is offered. This is not a protective policy; it is a managed-erosion policy. It fails to protect the green gaps that the plan's own paragraphs 10.3 and 10.8 identify as providing flood absorption capacity, biodiversity corridors, and separation between settlements.

The 2021 flood events are directly referenced in the plan. Green buffer land between the town and neighbouring settlements serves a flood management function alongside its landscape and separation roles. A policy that permits its loss in exchange for "replacement landscaped areas" (which may be much smaller in area or less hydrologically functional) does not adequately protect this capacity.

REQUESTED MODIFICATION: Request for modification: Policy NE5 (Green Gaps)

Current wording:

Proposals that result in the loss of undeveloped land between Cirencester and its neighbouring parishes should compensate for this loss through appropriate replacement landscaped areas.

Proposed wording:

Development proposals that would result in the loss of, or material harm to, undeveloped land within the Green Gaps identified on the Policies Map will be refused. Exceptions will only be permitted in very special circumstances where it can be demonstrated that: (a) the proposal would deliver essential community infrastructure with no viable alternative location; (b) the hydrological, ecological and landscape functions of the affected land will be fully maintained; and (c) there is no net loss of land providing flood absorption or attenuation capacity.

Justification:

The current wording inverts the policy intention by permitting loss through compensation. The modification aligns NE5 with the approach taken in Policy NE4 (Local Green Space Designations), which correctly protects designated spaces 'except in very special circumstances.' There is no justification for a weaker test in Green Gaps, particularly given the plan's own evidence on flood risk and the groundwater conditions in Cirencester.

5. Landscape and Townscape Views: Advisory Wording Leaves Vulnerable Sites Exposed

5.1 Policy DBE2: Protection of Landscape and Townscape Views

Policy DBE2 requires development proposals to "demonstrate how they will protect and enhance" a list of identified important views. The policy then lists specific locations of concern. Two are particularly notable in the context of future residential development:

- The former Watermoor Primary School site (Trinity Road and Watermoor Road): the plan explicitly states the school "is currently empty and vulnerable to development" and that development "could and would" affect valued views of the church spire.
- Powell's School Playing Fields (Barton Lane): described as an open aspect from extensive school playing fields which "can sometimes offer potential to reduce in size and zone for development."

Soundness concern: the plan flags vulnerability but provides no hard protection

Both sites are identified in the plan's own evidence as being at risk of development. The policy response is to list them as views to be 'protected and enhanced.' This is not site-specific protection. A developer proposing residential development on either site could argue that the proposal 'demonstrates how it will protect and enhance' the view, perhaps by setting back buildings or retaining sightlines, and Policy DBE2 would provide very limited grounds for refusal. The plan identifies the problem but provides no effective solution.

REQUESTED MODIFICATION: Request for modification: Policy DBE2 and at-risk sites

Current wording:

Development proposals should demonstrate how they will protect and enhance the following views... [list follows]

Proposed wording:

The existing view protection requirement should be retained and strengthened by adding: 'For the specific sites identified at (a) former Watermoor Primary School and (g) Powell's School Playing Fields at Barton Lane, which are identified in this plan as being particularly vulnerable to development that would harm identified views and the open character of their settings, development proposals must demonstrate that no harm will occur to the identified views. Where a proposal would cause harm to these views, it will be refused unless it can be demonstrated there are material considerations of sufficient weight to justify an exception, and any harm is fully mitigated.'

Justification:

The plan identifies these specific sites as vulnerable. Without site-specific policy protection, the general view protection requirement is insufficiently effective to prevent harm. This modification makes explicit what the plan's evidence implies.

6. Royal Agricultural University Innovation Village: Unresolved Development Pressure

The plan (paragraph 2.24, as noted in the evidence base for this plan) refers to the possibility that if new student accommodation is approved for the Royal Agricultural University, further student accommodation should be considered through the RAU masterplan for the "Innovation Village." Employment land is also noted as being designated within the proposed Innovation Village on University land (paragraph 11.6).

This amounts to an implicit acceptance that a further phase of development is anticipated on the western edge of the town, beyond the Steadings. The plan does not contain any policy that:

- defines the boundary of acceptable development associated with the Innovation Village;
- makes such development conditional on resolution of the infrastructure deficits already identified in this plan;
- assesses the cumulative impact of Innovation Village development alongside the unresolved pressures from the Steadings.

A plan that anticipates further growth in a specific location but provides no policy framework to govern it is not effective. The examiner should be asked to consider whether a specific policy or development brief for the Innovation Village area is required as a condition of the plan's soundness, or alternatively whether the plan should expressly state that no further residential development associated with the RAU will be permitted until identified infrastructure deficits are resolved.

7. Conclusion and Requested Actions

I ask the Examiner to consider the following modifications as necessary to make the plan sound:

Policy / Issue	Soundness concern	Requested modification
Cumulative impact (no policy)	No policy assesses or limits cumulative development impact despite evidence of disproportionate recent growth	New policy requiring cumulative impact assessment before residential development of 10+ dwellings
Infrastructure sequencing (para 10.53)	'Should' language is aspirational, not effective, given documented sewer capacity failure	Mandatory pre-permission requirement for demonstrated sewer capacity or legally binding upgrade agreement
Healthcare provision (no policy)	No policy makes development conditional on GP/healthcare capacity despite admitted waiting lists	New policy requiring healthcare infrastructure to be secured before development commences
Policy NE5 (Green Gaps)	Permits loss of undeveloped land through compensation; undermines flood absorption capacity	Strengthen to resist loss except in very special circumstances; require no net loss of flood-attenuation land
Policy DBE2 (Landscape Views)	Identifies vulnerable sites but provides only advisory protection	Add site-specific protection for Watermoor School and Powell's Playing Fields
Innovation Village / RAU	Further development anticipated but no policy framework or infrastructure sequencing requirement	Define boundary, condition on infrastructure resolution, or explicitly defer pending Steadings assessment

I consider that the plan as submitted is not sound in the respects identified above.

However, I recognise that the role of the Examiner is not to reject the plan but to identify modifications necessary to make it sound. I therefore ask that the Examiner require the modifications described in this representation as conditions of the plan's approval.



Date: 17 April 2026

Rep #3: NATIONAL HIGHWAYS

Mark Harrison

From: Sally Parish [redacted]
Sent: 20 April 2026 15:39
To: Neighbourhood Planning
Cc: [redacted]
Subject: DL 29/5/26 - Cirencester Neighbourhood Plan - Reg. 16 Consultation - National Highways response

[redacted]

Mark,

Thank you for providing National Highways with the opportunity to comment on the draft Cirencester Neighbourhood Plan – Regulation 16 Consultation. National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance consists of the A417 which runs through the north east of the Plan area. We previously provided comments on the Regulation 14 draft in March 2024.

We are interested in the traffic impact of any future development proposal and specifically the impact of growth on the continued safe and efficient operation of the SRN. In respect of traffic and transport, Plan polices should ensure development mitigates its traffic impact on the surrounding network which includes reducing the reliance on the private car by requiring development to both safeguard and improve local facilities, services, and sustainable transport options.

Following our review of the draft we are satisfied that the proposed policies within the draft Neighbourhood Plan are unlikely to result in development which will adversely impact the SRN and we therefore have no specific comments to make on the document. This does not however prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.

Kind regards,

Sally

Sally Parish, Spatial Planning, South West Operations
[redacted]B

Web: www.nationalhighways.co.uk

Covering: B&NES, Bristol, Cheltenham, Cotswolds, Forest of Dean, Gloucester City, South Gloucestershire, Stroud, Tewkesbury, West of England

[redacted]

David Wilson

[redacted]

[redacted]

Issued via email:
neighbourhood.planning@cotswold.gov.uk

13 May 2026

Cotswold District – Cirencester Neighbourhood Plan Consultation Submission Version

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the majority of the Cotswold District and are hence a **"specific consultation body"** in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

We have the following comments on the consultation in relation to our water supply and sewerage undertakings:

General Water and Wastewater Infrastructure Comments

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2024, states: "*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for… infrastructure for waste management, water supply, wastewater…"*

Paragraph 11 states: "*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*
a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"

Paragraph 28 relates to non-strategic policies and states: "*Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure…"*

Paragraph 26 of the revised NPPF goes on to state: *"Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production*

of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary…."

The December 2025 draft National Planning Policy Framework (NPPF) consultation, published by the UK Government, proposes updates to national planning policy. The draft highlights the importance of resilient water infrastructure, with Policy W4: Water Infrastructure supporting the delivery and upgrade of water supply and treatment facilities. The policy recognises the benefits of improving capacity, reliability, and water quality, stating that proposals for such infrastructure should be given 'substantial weight'.

The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *"Adequate water and wastewater infrastructure is needed to support sustainable development"* (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's pre planning service are available at: https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity

In light of the above comments and Government guidance we agree that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend that the Neighbourhood Plan include the following policy/supporting text:

"Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades."

"The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."

Water Efficiency/Sustainable Design

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:
https://www.thameswater.co.uk/Be-water-smart

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Proposed policy text:
“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”

Comments in relation to Flood Risk and SUDS

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract

water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. The neighbourhood Plan should include a specific policy on SuDS in line with the following hierarchy:

"Developers should ensure that surface water run-off is managed as close to source as possible in line with the following drainage hierarchy:

1 store rainwater for later use

2 rainwater infiltration to ground at or close to source

3 rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)

4 discharge rainwater direct to a watercourse

5 controlled rainwater discharge to a surface water sewer/drain

6 controlled rainwater discharge to a combined sewer

It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."

Site Allocations

There are no new allocations in the draft Neighbourhood Plan and the level of information does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What water supply requirements are required on and off site
- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated

Upgrades to the Thames Water infrastructure should not be underestimated. It can take 18 months to 3 years or local upgrades, 3-5 years for more strategic ones and up to 10 years for Sewage treatment works.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully,

David Wilson
Thames Water Property Town Planner

Rep #5: Resident

Mark Harrison

From: [redacted]
Sent: 15 May 2026 20:43
To: Neighbourhood Planning
Subject: Comments on Cirencester Neighbourhood Plan

[redacted]

Hello,

Please see below for my comments on the Neighbourhood Plan:

Policy AM4 –Mobility Hub

Having lived in the town for over 40 years the need for a transport hub is greater than ever. The Old Station site is by far the best location – close to dual carriageway, short walk to town centre, near to hospital and RAU.

Policy DB5a – Net-Zero & Energy Efficiency

I note the inclusion of the phrase “embodied carbon”. In order to reduce energy loss from buildings developers will need to increase the use of insulation materials which themselves will increase the embodied carbon footprint. This would seem to make it impossible to satisfy the policy.

Policy DBE6 – Energy Use in New Buildings

For owners of homes built to a net zero standard there would be a benefit of markedly reduced energy bills compared with those built under existing legislation. Owners would therefore benefit from having an increased level of disposable income some of which would be likely to support the town’s economy. Developers using land with extant planning permission should be persuaded to build to a higher (net zero) standard; this would merely equate to something in the order of 2% on their investment returns.

Policy TMN1 – 20 Minute Neighbourhoods

Greater emphasis should be placed on the provision of appropriate health facilities within the 20 minute neighbourhood.

Policy WBC1 – Air Quality

An additional requirement for the Council to monitor air quality (including particulates) should be included.

Kind regards

[redacted]

Mark Harrison

From: [redacted]
Sent: 21 May 2026 09:13
To: Neighbourhood Planning
Subject: Neighbourhood plan comment

[redacted]

Good morning.

I have a few comments and ideas.

Parking.
1. For current residents who live in historic housing without parking provision.

We are gradually being squeezed out and parking becoming more limited.

Eg The resent change on Dollar Street which has compromised locals without good a good enough reason forthcoming from the highways department.
A now v quiet road, after school drop off. We can walk into town in the middle of the road at most times of the day and especially in the evenings.
Where can residents park now? Especially in the evenings after work?

2. New builds and conversions within the town centre.

No new building or conversion should be permitted without adequate parking provision. People have cars and will always have cars. Unless the public transport is considerably improved provision for parking should be of high priority. It's not. It's being ignored. Applications are being allowed without this provision. This is against your very own recommendations. Why?

3. Parking charges and spaces.

Too expensive.
Why put such a barrier up to those wanting to visit Cirencester. Make it cheaper and they will come.

Market place evening.
Allow parking in the centre in the evening. It's so quiet and unnecessarily policed. We live on Dollar Street and there are almost no cars after 8/9pm.

Getting around town
1. As castle Street is now one way (the other way), some residents have to do a huge loop, going through the market place.

2. When some roads are closed, eg around Waitrose, there is no way of accessing our road unless you take a massive detour via Kemble or similar. Better signage would help but it is a problem generally.

3. The market place. It's it still a shared space? I have noticed the signs have gone but there has been no notification.

4. Cricklade Street. This needs a decision. Is it pedestrian or a road. It's so confusing and never policed. I saw a man get knocked down outside Boots, I was hit by a cars wing mirror and my daughter was hit by The Robin bus. She contacted them but has heard nothing.
The road needs to be much much better. People who insist driving down there are far too fast. Why isn't it policed?

Thank you. Hope some of this helps.

[redacted]

Sent from my iPhone

Rep #7: Resident

Mark Harrison

From: [redacted]
Sent: 21 May 2026 09:15
To: Neighbourhood Planning
Subject: comment on Cirencester Neighbourhood Plan

[redacted]

I read in the neighbourhood plan that access to sport and recreational spaces in important. I would like to bring up the access to the Cricket Club and Tennis Club after 4.45pm (last entrance time to the park) via Cirencester Park. It is so frustrating that access to the park is so limited in the evenings.
Where children should be able to walk from town to the club parents are having to get in cars and drive. It seems absolutely madness. Perhaps Bathurst would consider opening up access in the evenings just to the sports clubs access - in the summer months at least?!

Best regards,
[redacted]

Rep #8: Resident

[redacted]

Please see below my comments on the 2026 plan, some of which pick up on previous comments on the 2024 pre-submission consultation by myself, Huw Jones, also submitted as part of the response of Cirencester Wildlife Group.

There are very many improvements from what was already a notable and welcome document. Some highlights and remaining areas of concern are highlighted below.

Chapter 5 Town Centre

Welcome addition to Principle 18 "...minimising hard-standing surfaces and enhancing soakaway"

Chapter 6 Access and Movement

Policy AM1
Welcome additions to Policy AM1 which in the final paragraph makes welcome reference to biodiversity connectivity.
Could this be usefully spelt out more by adding ... "eg with green margins such as hedgerows, lines of trees" (I have avoided saying green verges as that might imply something limited and mowed!)

Also in the related ..
Para 6.8.14
Welcome specific additions to routes included in para 6.8.1.4 to 6.8.1.7

Policy AM3 g. and h. are strengthened but could be stronger.

g. could say moving all "visitor" and "non-essential" parking including all-day and long-stay parking towards the periphery?

h refers to "unnecessary" through traffic. Suggest losing the word "unnecessary" and adding the word "all" if as seems obvious, the aim is to remove all through traffic.
(For justification, just think of how much more pleasant it is to be on Cricklade Street than Dyer Street or Castle Street. Great that Cirencester is moving in the right direction unlike poor Tetbury with the bumper-to-bumper traffic through the town all day every day. What does that do for high street business!?)

Is it counter-productive to spell out the aspiration in a promiment place eg para 6.1
to pedestrianise the town centre to make it attractive to people and a safe, healthy and pleasant place to spend time?
Does this belong in 6.1?

Table 1 page 44
Under Cotswold Water Park and South Cerney.
Could add an additional reference in support of connectivity between Cirencester and the Cotswold Water Park/South Cerney (and Somerford Keynes) all via Siddington in:

Siddington Neighbourhood plan Policy Reg 14 version available at:
https://www.siddingtonparishcouncil.org.uk/wp-content/uploads/2026/03/SPC_1105_0326-Neighbourhood-DP-v2.pdf
In policy S10: Sustainable Transport and Active Trave. Part 2, proposed paths are supported:
Part 2a from Tesco to Siddington Road to Tesco
Part 2b from Siddington to Cirencester adjacent to Siddington Road

Part 2c Proposed route from Siddington through Orchard Fields to the Steadings;
Part 2d from Siddington to South Cerney via the disused railway line

... and additionally
2e The change in use of Green Lane (a Quiet Lane leading off Clark's Lane) from a highway to a foot and cycle route. (ie from Siddington to Shorncote (Somerford Keynes). This route is also supported in the LCWIP Table 1 P37 (Primary Route 1 Siddington to Shorncote).

NOTE: There is already welcome support for the LCWIP in Cirencester NP para 6.3

Chapter 10 National Environment

Local Green Spaces. The initial list of about 46 suggested green spaces has been cut back to 10 which is very disappointing. It seems as if a policy decision has been taken to exclude many categories of green space. This is not explained.
Why are churchyards and cemeteries excluded? Are they deemed not to be at risk. Nevertheless they are likely to have significant community and wildlife value.
Likewise allotments which have considerable community, amenity, public health and wildlife value.
Sports fields have also been excluded yet these have signficant amenity, community and public health benefits.

Some of Cirencester's most notable public parks as well as semi-natural green spaces are excluded yet these have significant footfall/public amenity value, cultural value and/or value to wildlife which makes them deserving of protection. A list of six exclusions in this last category (Parks and semi-natural green spaces) that are of particular note are listed below, tested agains LGS designation criteria and their main qualifying attributes are listed. From most notable to least notable.

Using the NPPF LGS criteria:
Are they a)Close, Special Not extensive
Abbey Grounds Yes, Yes, ?
Kingshill Meadow Yes, Yes, Yes
City Bank Glade and Railway Embankment Yes, Yes, Yes
Wooded corridor along the Churn from a) Barn Theatre to Old Beeches Road bridge Yes, ?, Yes
Wooded corridor along the Churn from b) New Mills to Watermoor Point Yes, ?, Yes

Abbey Grounds. Extremely popular. Very accessible. High amenity value (playground, bandstand, table-tennis). Used for popular mass-participation public events (Phoenix Festival, Big Lunch). Landscaped – excellent views including across the lake to the parish church. Historic - culturally signficant with visible medieval (Norman Arches, Abbey, Ice store) and ancient history (Roman Wall). Significant wildlife (two/three rivers, lake, veteran trees, mature trees, ponds, adjacent relatively undisturbed wildlife area).

Kingshill Meadow. Popular, very accessible. Amenity value (dog walkers), Wildlife value (pond with Great-crested newts), old and newly planted hedgerow, species-rich meadow with characteristic (Cotswold) limestone grassland species, trees. Unsuitable for development (under pylons, includes a formey quarry backfilled with municipal (?) waste). This appears to have been almost entirely overlooked. There is a significant oversight in the 2024 consultation document where it is mistakenly considered to be part of the adjacent Kingshill Sports field and described as "an open area of field"(Appendix 4, Site 31). It is not – there is hedgerow, a pond, semi-natural grassland, an area that is orchid rich . Arguably this is worthy of Local Wildlife Site or Local

Nature Reserve status yet is omitted from the 2026 document altogether. The site was the venue for a signficant recent (Feb 2026) community project organised by CTC with 200m of hedgerow, provided by the Tree Council with planting carried out by CTC, a community group and the nearby secondary school. I wonder if it has been lost in the confusion between three or four similarly named sites: Kingshill School playing fields, Kingshill Sports development/playing fields, Kingshill Meadow and Kingshill Country Park.

See Map below which shows Kingshill Meadow separate from Kingshill Primary School and the Playing fields there are:
A) meadow including species-rich grassland, trees, old hedgerow, newly planted hedgerow, a large pond.
B) Orchid-rich area. Not in use as part of playing field perhaps due to outcropping limestone and very thin soil cover.
C) Rough grassland



City Bank Glade
Significant popular footpaths connecting Beeches Estate to Ciren Primary School and town centre. Part of Hare Festival Way. Wildlife value (Woodland with mature trees, pond, river). Proposed as addition to City Bank LNR (City Bank LNR Management plan, 2025)

City Bank Railway embankment
Significant popular footpath connecting Beeches Estate to Watermoor. Wildlife value (Woodland with mature trees). Proposed as addition to City Bank LNR (CB LNR Management plan, 2025)

Wooded corridor along the Churn from a) Barn Theatre to Old Beeches Road bridge. Significant popular footpath connecting Beeches Estate to Watermoor. Part of Hare Festival Way. Wildlife value (Woodland with mature trees, river).

Wooded corridor along the Churn from b) New Mills to Watermoor Point. Footpath access with occasional use by dog walkers. Wildlife value (Woodland with mature trees, river).

To note that City Bank Recreation Field is part of the deisgnated Local Nature Reserve at City Bank so appears to already enjoy greater protection than offered by Local Green Space designation.

Thank you for retaining sections 10.70 (risk of urban sprawl and damaging communities given increasing threat from development), 10.71 (public recognition of and support for the connection with the surrounding landscape), 10.7.2 (preserving distinct identity of Siddington and Preston), 10.7.3 (importance of visual separation),10.7.4 (prioritising development in less sensitive areas)

Rep #9: Resident

Mark Harrison

From: [redacted]
Sent: 26 May 2026 12:39
To: Neighbourhood Planning
Subject: Cirencester - Regulation 16 Consultation

[redacted]

The Cirencester Neighbourhood Plan is an impressive document – Thorough, comprehensive, detailed, professional. It is a long read, but it feels that it covers all the issues facing the Town.

However, the key question is – What difference will it make? The most pressing issues have been known for years but all that we have ended up with, after huge amounts of hard and high-quality work by volunteers and considerable expenditure by the Town Council, is a "Wish List".

On joining the Neighbourhood Plan Steering Group in early 2020, and understanding what was required, I quickly concluded that what Cirencester requires is a timebound Action Plan, not a Neighbourhood Plan. This opinion did not diminish during the time of my membership, the majority of which was spent as Chair, until stepping down in July 2023. When are the issues, particularly around Active Travel, going to be addressed? To provide some examples:

- Cricklade Street in Cirencester was first partially pedestrianised in the late 1980s but still cars abuse the restrictions and, as soon as they are lifted at 16:30 (with the shops open for a further hour), it becomes a dangerous free-for-all

- Suggestions, fairly simple to implement, have been made on numerous occasions to stop the rat runs. The most important being from the Tetbury Road to the Gloucester Road via Park Street and Thomas Street. The other is along Lewis and Querns Lane. As the Plan states the Ring Road, built in the mid-1970s, creates numerous downsides in terms of Active Travel and should be keeping traffic out of historic streets. However, until the rat runs are addressed, the Town will not be accessing the full benefits that it could provide

- The Cirencester Local Cycling and Walking Infrastructure Plan (LCWIP) was published in June 2022 by Gloucestershire County Council. Four years later, while considerable sums are being invested to deliver a cycle path from Bishops Cleeve to Gloucester and beyond, there is no delivery plan for the Cirencester LCWIP. To provide just one small example of what is wrong in Cirencester, the shared space path along the Gloucester Road is dangerous for pedestrians and frustrating for cyclists. It beggars belief that it is considered an appropriate facility.

I do not want to nitpick through the document but do want to highlight a few points that jumped out of the page:

- The education provision is lauded but does not mention that a significant number of parents choose to send their children to the grammar schools in Cheltenham, Gloucester and Stroud. In addition, a smaller number also travel to Balcarras in Cheltenham and Farmors in Fairford for secondary education

- The cultural provision is less than it could be with the need to travel out of the Town for quality music concerts and events

- Mention is made of the Very Light Rail project which will never happen. This inclusion feels like virtue signalling

- The Town Centre Master Plan is mentioned but my understanding is that this project has been abandoned by the District Council

- The Plan covers a number of green spaces but does not mention the lack of space for informal ball games in the Bowling Green area. The Abbey Grounds could meet this need but there are two downsides:

    - The need for youngsters to cross the Whiteway or Spitalgate Lane, both of which lack traffic light-controlled crossings
    - Dogs allowed off the lead means that games would be continually interrupted

- The Plan mentions that the Leisure Centre is at full capacity but ignores the fact that much physical activity is delivered via community sports clubs which may well have similar issues as the Town expands.

To summarise, the Plan is an impressive document. However, it fails the key test of providing confidence that the items listed in the Projects List will ever be delivered.

Kind regards

[redacted]

Rep #10: Cirencester Action on Buses

Mark Harrison

From: [redacted]
Sent: 27 May 2026 08:00
To: Neighbourhood Planning
Subject: Cirencester Action on Buses' response to Cirencester Neighbourhood Plan - May 2026

[redacted]

Cirencester Action on Buses (CAoB)

Response to Cirencester Neighbourhood Plan – Regulation 16 Consultation

1. **Introduction**

Who we are:

Cirencester Action on Buses (CAoB) is an independent, volunteer-led passenger group representing the experiences of bus users in Cirencester and the surrounding area. We engage directly with operators, local authorities and other stakeholders and aim to support the development of a coherent, usable public transport network.

We welcome the opportunity to respond to the Cirencester Neighbourhood Plan, particularly in relation to access, movement and connectivity. CAoB also recognises the significant work undertaken by the Town Council and contributors in developing a comprehensive and detailed Plan.

2. **Overall Position**

CAoB supports the Plan's overarching aims, including:

- responding to the climate emergency;
- reducing reliance on private vehicles;
- improving access to employment, education and services;
- strengthening connections to surrounding towns, countryside and key destinations;
- improving wellbeing, inclusion and accessibility;
- and supporting connected, sustainable communities.

The Plan provides a clear and evidence-based diagnosis of current transport challenges, including:

- over-reliance on cars;
- limited and infrequent bus services;

- poor connectivity to Kemble Station;
- barriers to movement within the town;
- the effects of poor accessibility on inclusion and wellbeing.
- and the need to build sustainable transport into new development

CAoB particularly welcomes the Plan's repeated emphasis on:

- connected neighbourhoods;
- permeability and movement between communities;
- access to community facilities and green spaces;
- reducing severance caused by major roads;
- and ensuring places are accessible without requiring a car.

A. Cirencester as a major employment, education, cultural and service centre.

The Plan also highlights the town's wider strategic importance. Major employers and institutions within the town include professional services, education providers and public sector organisations, alongside a significant hospitality and retail sector and a large number of smaller businesses and start-ups. Cirencester supports a substantial proportion of employment within the district and as such **attracts significant commuter movements from surrounding areas including Stroud, Swindon and North Wiltshire.**

The Plan also notes **recruitment challenges** in sectors including hospitality, digital and engineering, as well as difficulties recruiting key workers.

Together, these factors reinforce the **importance of ensuring** that **transport connectivity functions effectively both within the town and between Cirencester and surrounding communities.**

There is an opportunity to bring the same level of clarity applied to walking, cycling and road infrastructure to public transport provision. In particular, the Plan does not yet translate its analysis into sufficiently specific, deliverable public transport outcomes.

CAoB also welcomes the Plan's explicit recognition that reducing reliance on private vehicles and supporting a "20 Minute Neighbourhood" model will require enhanced public transport, an Integrated Mobility Hub, and improved pedestrian and cycle access across the town.

CAoB strongly supports this integrated approach. However, the effectiveness of **these ambitions will depend not only on physical infrastructure, but also on the availability of practical, reliable and well-connected public transport services operating across the town and the wider area.**

B. Importance of public transport alongside 20 Minute Neighbourhoods:

The Plan also recognises that 20 Minute Neighbourhood principles depend upon accessibility "on foot, by cycle or public transport", and **that many important destinations,** including healthcare,

employment, education and cultural facilities, **extend beyond immediate residential neighbourhoods.** This further reinforces the **importance of practical and well-connected public transport links both within Cirencester and to surrounding areas.**

C. Public Transport and New Development:

CAoB also considers it important that **new development is planned alongside well-integrated and accessible public transport provision from the outset,** including effective connections to employment, education, healthcare, rail services and surrounding communities.

Early implementation and visibility of sustainable transport options before development is completed and ideally before substantial occupation, may **play an important role in shaping long-term travel patterns and encouraging greater use of public transport,** walking and cycling from the outset, **rather than allowing car dependency to become established.**

3. **Kemble Station Connectivity:**

The Plan correctly identifies Kemble Station as a key transport asset, but notes that it is:

“not fully utilised because of poor bus service connections”
and that:

“improved connections are needed, including early morning, late evening and weekend services.”

CAoB strongly supports this analysis.

The Plan would benefit from clearer support for:

- regular, reliable, timetabled and easy-to-understand bus services operating to clear and memorable patterns between Cirencester and Kemble;
- operation across the full day, including earlier and later journeys that improve access to rail services;
- seven-day provision, including Sundays;
- and timetables aligned with train arrivals and departures.

The references elsewhere in the Plan and appendices to:

- regional connectivity;
- rail interchange;
- and enhanced all-week public transport links

reinforce the importance of practical integration between bus and rail services.

The importance of effective connectivity to Kemble Station is also likely to increase over time as Cirencester’s population grows and additional development comes forward over the Plan period.

Without this level of clarity, there is a risk that the issue is recognised but not effectively addressed.

4. **Public Transport appearing in the Plan as a Service, Not Just as its Infrastructure**

The Plan contains a number of important observations, proposals and policies relating to bus connectivity, interchange, information, accessibility and movement around the town.

It also demonstrates a strong understanding of the relationship between transport usability, journey times, interchange quality, passenger confidence and wider accessibility.

Compared with the extensive spatial and implementation detail relating to walking, cycling and public realm improvements, however, public transport service provision and wider network functionality are articulated in less operational and implementation detail.
CAoB would welcome the Plan providing similar clarity regarding the design and usability of public transport services themselves.

This includes:

- routes that connect effectively with the places people need to reach;
- regularity and reliability of services;
- frequency and journey times;
- direct and time-competitive connections to key destinations;
- simple, regular, memorable and easy-to-understand service patterns and timetables;
- good onward connections between services and modes of transport;
- ease of interchange;
- usability for everyday journeys;
- and practical accessibility for residents and visitors.

This is particularly important given the Plan's references to:

- commuting and employment access;
- pupil and student travel patterns;
- recruitment challenges across key sectors;
- tourism and the visitor economy;
- and social participation and wellbeing.
- access to clear information re services

- effective promotion of services,

- and understandable journey planning in both electronic and hard copy form

CAoB would emphasise that the **usability of public transport is strongly influenced by overall service design and network integration.**

All the above factors affect whether services can be used practically and confidently in everyday life.

Public transport is most effective when services are visible, easy to understand, well promoted, connect well with key destinations and provide reliable onward journeys throughout the day.

A transport system is only effective if it is practical and reliable for real-world use.

5. **Cirencester College and Education Travel**

The Plan notes significant daily education-related travel into and out of Cirencester, including approximately 2,395 students commuting daily into the town from outside Cirencester in 2022.

This reflects the town's wider role as an education centre and highlights the importance of effective and coordinated transport connectivity for students and pupils travelling from across the surrounding area.

This represents a major and consistent source of transport demand which is why the College in particular, has effectively become a significant commissioner of transport in the area.

The Plan could be strengthened by encouraging greater involvement of the College in discussions around town-wide transport design and service planning.

As a significant commissioner of transport services, the College has an important influence on wider travel patterns within and beyond Cirencester.

Changes to education-related transport provision may therefore have implications not only for students, but also for the wider usability, connectivity and functioning of the local transport network.

- There may also be value in encouraging schools and education providers to participate more closely in wider transport discussions, recognising the importance of pupil travel patterns within the local network and the potential impact of wider network changes on access to education.

- School and college travel forms a significant component of daily movement into and around Cirencester, and changes affecting major corridors may have wider implications for journey times, reliability, accessibility and wellbeing for young passengers and their families

- Local schools also represent a major and consistent group of public transport users whose travel needs form an important part of the wider transport picture.

This reinforces the **importance of coordination between major institutions, operators and transport authorities when significant transport changes are being considered.**

6. **Integrated Mobility Hub**

CAoB agrees with the Plan's assessment that Cirencester currently lacks a clear, well-functioning and integrated transport hub, and supports the principle of improved interchange facilities.

Any future mobility hub should **support integration between different forms of transport, including local bus services, longer-distance coach services, walking and cycling infrastructure, rail connectivity, and other sustainable transport modes identified within the Plan.**

At present, longer-distance coach services and the main local bus interchange points are located in different parts of the town centre, with limited integration between them. CAoB would also note that interchange arrangements and wayfinding are not always obvious for passengers, particularly visitors and infrequent users.

Clearer signposting, information and physical integration between transport modes could therefore play an important role in improving usability and confidence in the network. Improving the visibility and legibility of public transport across the town may also help encourage greater confidence and awareness among both existing and potential users.

The **quality, accessibility and visibility of bus stop infrastructure — including shelters, timetable information and real-time passenger information — may also influence confidence and usability** across the wider network.

The Plan also rightly recognises the importance of ensuring that bus services can access any future hub efficiently without unnecessary diversion through the one-way system, alongside the need for good customer facilities, real-time information, accessibility and accommodation for coaches, community transport and demand responsive services.

CAoB also welcomes the Plan's recognition of the importance of visitor information, customer facilities and appropriate operational facilities for transport staff within any future hub arrangement.

Well-designed interchange environments, including accessible information, seating, toilets, refreshments and appropriate driver welfare facilities**, may help improve usability,** passenger confidence, comfort and operational resilience across the wider network.

As **different** potential hub **sites may have very different implications** for movement, accessibility and interchange, **early visibility of emerging concepts and layouts may help support more informed discussion around usability, connectivity and integration with the wider transport network.**

However, it is important to ensure that:

"a hub supports a strong network, rather than acting as a substitute for it."

The effectiveness of any mobility hub will depend on:

- the frequency and reliability of services using it;

- the ease of connections between routes;
- integration with walking and cycling routes and other transport nodes;
- clear and consistent passenger information;
- and the ability of passengers to make practical onward journeys safely and confidently.

Walking and cycling routes are also likely to be **most effective where they connect clearly and conveniently not only with a central mobility hub, but also with bus stops and transport corridors across the wider network**. Integrating active travel routes with everyday public transport access points may help support more practical and flexible sustainable journeys across the town.

7. **Bus Routing and Street Constraints**

A. Street layout and routing:

The Plan highlights concerns that street layout and narrow roads can restrict bus operation.

CAoB recognises that physical constraints can affect routing. However:

- services do operate within the town;
- routing decisions are influenced by accessibility, operational considerations and passenger demand, although changes may sometimes disadvantage areas which also have significant levels of passenger use;
- and changes to routes can have unintended consequences for usability and patronage.

Recent changes to local routing patterns have also affected connectivity within parts of Cirencester itself, illustrating how service alterations can influence accessibility to employment, shopping, healthcare and community facilities even within the town.

Given **the potential impact of route changes on accessibility, journey times, education access and connectivity within different parts of the town, significant re-routing proposals may benefit from early discussion and engagement with affected communities and stakeholders.**

A balanced approach is therefore important, supporting:

- direct, legible and efficient routes;
- practical measures such as parking restrictions or provision of parking elsewhere, to improve bus movement where needed;
- and good accessibility between neighbourhoods, facilities and transport links.

B. Areas unserved by bus routes:

The Plan also identifies employment and retail areas where connectivity between different parts of the town remains limited.

There are specific areas of concern eg no return service to Watermoor from the town and no services at all for the industrial estate.

Improving practical links between residential areas, employment sites, retail areas and surrounding communities will help support accessibility, labour mobility and more sustainable travel patterns.

The wider themes within the Plan around permeability, movement and reducing severance are highly relevant here.

8. **New Development – Including the Steadings**

The Plan includes significant proposals for new development but **contains limited explicit reference to how public transport services will be integrated and implemented from the outset.**

The scale of planned growth further reinforces the importance of embedding and implementing public transport provision within development planning from the outset. The Plan notes that Cirencester is expected to accommodate a substantial proportion of the district's future housing growth over the Plan period.

This increases the importance of ensuring that transport infrastructure and services develop alongside housing growth in a coordinated and timely way.

CAoB recommends that the Plan should emphasise:

- early design and implementation of public transport provision;
- direct and convenient connections between easily walkable and accessible bus stops, transport corridors, wider public transport nodes and active travel routes;
- good, practical and well-connected public transport links between new development, the town centre, Kemble Station, employment areas, the Education Quarter, healthcare facilities and surrounding neighbourhoods;
- and integration between new neighbourhoods and existing communities.

Consideration should be given to how new development connects with a wider range of destinations across Cirencester and beyond it. Public transport provision is likely to be most effective where it forms part of an integrated town-wide network linking residential areas with employment, education, healthcare and strategic transport connections, rather than operating in isolation from existing movement patterns and services.

CAoB would also emphasise that early implementation is vital. If services are introduced only after development is complete, there is a risk that car-based travel patterns become established. Early provision can help shape more sustainable behaviour from the outset.

This is likely to be most effective where services are also clearly promoted, easy to understand and visibly integrated into everyday movement around the development and wider town.

This is particularly important given the Plan's wider ambitions around:

- sustainable growth;
- connected communities;
- 20-minute neighbourhood principles;
- and reducing dependence on the private car.

9. **Access to The Cotswold Lakes, Surrounding Areas, Visitor Attractions, the RAU and reaching Stroud bus services on the Stroud Road**

The Plan highlights the importance of tourism, access to countryside and links to surrounding areas. It also repeatedly emphasises wellbeing, recreation and access to green spaces, plus access to educational institutions.

A. Access to the Cotswold Lakes by public transport:

However, **access to key destinations such as The Cotswold Lakes remains challenging by public transport despite the area attracting significant visitor numbers.**

While usage levels are an important consideration, CAoB's experience suggests that demand for such services can be influenced by:

- **the ease and safety of onward walking routes;**
- **the visibility and quality of bus stop infrastructure;**
- the availability and clarity of information;
- service frequency and journey times;
- and the availability of practical return journeys.

Although services have operated along roads serving areas of **The Cotswold Lakes, public transport accessibility is significantly affected** not only **by** service provision itself, but also by the quality, visibility and **safety of supporting road, pavement and bus stop infrastructure.**

In a number of locations, bus stops may be separated from destinations by busy roads, limited crossing facilities or inadequate pedestrian infrastructure.
Bus stops may also be difficult to identify and may lack shelters, timetable information or real-time passenger information.

Also, information on how to access specific destinations by bus is limited, and existing services do not provide a comprehensive or easily understandable picture of access across the wider area.

The Plan itself identifies barriers affecting movement between Cirencester, South Cerney and the wider Cotswold Lakes area, including severance caused by major roads and constrained pedestrian and cycling access.

In practice, all these issues may significantly reduce the usability and attractiveness of public transport for both residents and visitors, particularly where journeys involve unsafe, indirect or unclear walking routes between stops and destinations.

CAoB is aware that a bus service operating towards parts of The Cotswold Lakes and nearby villages has recently been withdrawn.

B. Poor bus stop and pedestrian safety infrastructure affecting access to additional areas:

Poor integration between bus infrastructure and safe pedestrian access may also suppress demand for services in other places, which might otherwise support more sustainable access to recreational and visitor destinations across the area.

For instance, bus services to Stroud from Deer Park and the College if not accessed from inside the College and school campuses, are accessed by crossing a busy road from the College. Or, via limited pavements from the University.

Plus, access to the Royal Agricultural University main entrance by foot and public transport involves crossing busy roads and using routes with limited or absent pedestrian infrastructure, creating potential barriers to safe, convenient and attractive sustainable travel.

Also, public transport links to some locations exist but may not be well promoted or easily understood by visitors, potentially limiting awareness and use eg the amphitheatre.

The effectiveness of public transport is influenced not only by service provision itself, but also by the **visibility and promotion of available services and destinations. Clear, accessible and joined-up information can play an important role in helping both residents and visitors understand how public transport can be used** to access local facilities, employment, leisure opportunities, visitor attractions and surrounding communities.

This **may also be important in encouraging greater awareness and confidence among existing residents who do not currently use public transport** regularly, particularly where travel habits are strongly car-dependent.

Taken together, **limited information, constrained pedestrian access, inconsistent infrastructure and reduced service provision risk weakening public transport accessibility to some of the area's most significant visitor destinations.**

Given the scale of the visitor economy associated with Cirencester, the wider Cotswolds and The Cotswold Lakes, **there is an opportunity to consider how public transport connectivity could support wider tourism, accessibility and sustainability objectives across the area**.

Cirencester's role as a visitor destination, together with increasing visitor numbers and **parking pressures at peak times, further reinforces the importance of accessible and sustainable transport connections for visitors as well as residents.**

10. **Very Light Rail**

The Plan refers to the potential for a "Very Light Rail" link.

While this may represent a long-term aspiration, bus services offer:

- greater flexibility;
- wider geographic coverage;
- quicker and lower-cost implementation.
- They also provide an opportunity to test and build demand.

The Plan would benefit from prioritising deliverable bus-based improvements in the short to medium term.

11. **Network Coordination, Oversight and Stability**

CAoB's experience is that the effectiveness of the local bus network depends on coordination between:

- commercial services;
- supported services;
- and services commissioned by third parties, including education providers.

Changes to education-related transport provision demonstrate how alterations in one part of the network can have wider impacts, including:

- disruption to established journey patterns;
- reduced usability of services;
- and impacts on both general passengers and students.

This **highlights the importance of a network-wide approach.**

This is also important where services cross local authority boundaries. Recent changes to services linking Cirencester with Malmesbury and surrounding villages demonstrate how decisions taken outside the town can still have significant impacts on connectivity, accessibility and journey opportunities for residents.

In general, while demand responsive transport may play an important role in some contexts, it may not always provide the same level of certainty, simplicity or flexibility as a regular timetabled service, particularly for passengers making regular or time-sensitive journeys.

The Plan could therefore benefit from recognising the importance of coordination with all the stakeholders in Gloucestershire and with adjoining authorities.

Where significant service changes or route alterations are proposed, there may be value in earlier discussion and engagement with passengers, affected communities and relevant stakeholders in

order to help identify wider impacts on accessibility, journey times, interchange opportunities and wider network usability before changes are implemented.

As the Local Transport Authority, Gloucestershire County Council plays an important role in overseeing the wider transport network, understanding how different parts of the system interact, and supporting a coherent, connected and effective transport system across the wider area.

This includes not only infrastructure planning and providing supported bus services, but also understanding how all parts of the network interact, how any service changes affect wider connectivity, and how passengers experience the network in practice.

The Plan could usefully acknowledge the importance of:

- coordination across different types of services and operators;
- understanding the cumulative impacts of network changes on passengers and connectivity at an early stage;
- maintaining oversight of how services interact across the wider network;
- clear communication between stakeholders, including passengers;
- and ensuring that significant network changes are well understood and communicated at an early stage prior to and after implementation.

This also includes:

- timely communication of road closures and diversions;
- clear and accessible information for passengers;

The Plan itself also recognises the importance of ensuring that Cirencester's transport needs are reflected within wider county-level transport strategies.

As a significant employment, education, service and visitor centre serving a wide rural catchment — and as a location expected to accommodate substantial future growth — Cirencester's transport connectivity requirements extend well beyond those of a purely local neighbourhood centre.

CAoB considers that this wider strategic role should be clearly recognised within transport planning, coordination and service provision.

The Plan could also be strengthened by recognising the importance of:

- effective coordination between stakeholders;
- understanding how services interact;
- and supporting a coherent, joined-up network.

- Effective oversight, coordination and communication are important in maintaining confidence in the network, supporting integrated and sustainable travel patterns, and helping ensure that the wider transport network functions coherently for residents, workers and visitors.

Given the interconnected nature of public transport provision, there may be value in ensuring that network changes and emerging connectivity issues are identified, understood and managed proactively wherever possible.

12. **Transport, Wellbeing and Community Participation**

The later sections and appendices of the Plan rightly recognise the close relationship between:

- accessibility;
- wellbeing;
- inclusion;
- social participation;
- and community life.

CAoB particularly welcomes the recognition that poor or intermittent public transport can contribute to:

- frustration;
- anxiety;
- loneliness;
- and social isolation;

The Plan also identifies the importance of:

- cultural facilities;
- sports and recreation;
- community meeting spaces;
- hospitality and the evening economy;
- and access to green spaces and countryside.

Cirencester also functions as a significant service, cultural and community centre for the wider area, including healthcare provision, education, cultural venues, community facilities, retail and hospitality. **Access to these services and activities** is therefore **closely linked to the availability of**

practical and accessible transport connections both **within the town and from surrounding communities.**

For many residents**, participation in** these aspects of community life **depends upon the availability of practical and reliable public transport, particularly during evenings and weekends.**

CAoB also recognises the **importance of evening connectivity to larger surrounding centres such as Cheltenham and Swindon, alongside wider regional connectivity towards destinations including Gloucester, Bristol and Oxford.**

This further reinforces the role of public transport in supporting employment, education, leisure and wider regional accessibility beyond standard daytime travel patterns.

Reliable and accessible public transport also **plays an important role in reducing social and economic isolation,** particularly **for residents without access to a private car and for those living in surrounding villages and rural areas.**

The Plan also notes that Cirencester has **a relatively high proportion of residents aged 65 and over**. This **further reinforces the importance of accessible, understandable and reliable public transport for maintaining independence, access to services and participation in community life.**

Access to employment, education, healthcare, shopping and community life can all be **affected by the availability, affordability and usability of local transport links.** In some parts of Cirencester and surrounding villages, **services may be limited, indirect or unavailable altogether, or may not operate at times that support practical everyday journeys.**

In some cases, **available services and journey opportunities may also be poorly understood or insufficiently visible**, potentially limiting confidence and awareness among both existing and potential users.

The Plan's emphasis on connected and inclusive communities therefore provides an opportunity to consider how uneven accessibility and gaps in provision may affect participation, wellbeing and transport choice across the wider area.

CAoB also **welcomes complementary community and cultural transport initiatives** which may help widen participation and accessibility. **However, such schemes are most effective when operating alongside a stable and coherent core public transport network rather than substituting for it.**

Public transport should therefore be viewed not simply as transport infrastructure, but also as:
community infrastructure;
wellbeing infrastructure;
and part of the wider accessibility framework supporting inclusive and sustainable communities.

The Plan's wider discussion of 20 Minute Neighbourhoods and community wellbeing also reinforces the importance of ensuring that residents can access not only nearby daily facilities, but also wider employment, healthcare, education, cultural and social opportunities across the town and beyond it. In this context, **public transport plays an important role in connecting neighbourhoods, reducing inequalities and supporting participation in community life.**

13. **Conclusion**

CAoB welcomes the Cirencester Neighbourhood Plan and its clear recognition of existing transport challenges.

The Plan contains strong and increasingly sophisticated recognition of the importance of sustainable transport, public transport connectivity, interchange, accessibility and movement around the town.

To fully deliver its objectives, however, the Plan would benefit from greater clarity on how these ambitions will translate into practical, usable and well-integrated transport provision and wider network functionality.

CAoB would welcome a stronger emphasis on:

- regular, reliable and well-connected bus services operating throughout the day and evening, across the week;
- effective integration with rail at Kemble;
- improved connectivity to key destinations including Cheltenham, Swindon, Gloucester and wider regional destinations accessed via Kemble and regional coach links, alongside strong connections to employment areas, the Education Quarter and surrounding communities;
- simple, legible, memorable and easy-to-understand service patterns and timetables;
- public transport provision embedded and implemented in new development from the outset;
- a network-first approach supported by infrastructure;
- clear information, visibility and promotion of services;
- high-quality and accessible stop and interchange infrastructure;
- and effective coordination and oversight to ensure that the network functions as a coherent whole.

The Plan increasingly recognises that accessibility, wellbeing, inclusion and participation are closely linked to practical transport provision.
Further strengthening the public transport dimension of the Plan would help ensure that its ambitions translate into real, usable and well-integrated transport options for residents, workers and visitors.

Rep #11: HISTORIC ENGLAND

Mark Harrison

From: [redacted]
Sent: 27 May 2026 11:30
To: Neighbourhood Planning
Subject: Cirencester Neighbourhood Plan - Reg. 16 Consultation
Attachments: Formal Notification of Cirencester Neighbourhood Plan Regulation 14 Consultation

FAO Mark Harrison

Dear Mark

Thank you for your Regulation 16 consultation on the submitted version of the Cirencester Neighbourhood Plan.

We have only a couple of additional comments to those made in our Regulation 14 consultation response (see attached).

It is not clear whether the Cirencester Town Centre Masterplan has yet been ratified and therefore the extent to which it forms a firm evidence base on which the Plan can confidently place its expectations.

Chapter 9 – The 20 Minute Neighbourhood – shows in various maps the Steadings Strategic Development Site. We assume this is a site allocation proposed through the Local Plan process but neither the maps nor supporting text make this clear. It would be helpful if this could be more explicitly asserted.

Kind regards

David

David Stuart | Historic Places Adviser

[redacted]

Historic England | South West

[redacted]

https://historicengland.org.uk/southwest

Historic England

Ensuring our heritage lives on and is loved for longer.
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[redacted]

have recei
formation

28 May 2026
L 260528 RL Bathurst CNHP Reg 16 Reps

Cotswold District Council
Trinity Road
Cirencester
GN7 1PX

Robert Linnell
[redacted]

Submitted via email to:
neighbourhood.planning@cotswold.gov.uk

Dear Sir/ Madam

Cirencester Neighbourhood Plan – Regulation 16 Consultation
Representations on behalf of The Bathurst Estate and Bathurst Development Limited

Savills is instructed by The Bathurst Estate and Bathurst Development Limited (BE and BDL) to submit the following representations on the Cirencester Neighbourhood Plan Regulation 16 Consultation (CNHP).

BE owns and manages a significant number of properties and land within the Neighbourhood Plan area. BDL is the master developer responsible for delivering the strategic, mixed use development known as The Steadings to the south-west of the Town, which is partially within the Neighbourhood Plan area.

Overall, BE and BDL congratulate the Town Council and wider Neighbourhood Forum for all of its hard work in preparing the CNHP. The document is well evidenced, is clearly laid out and is generally supported. However, we have the following comments to make to improve the plan:

Plan Period

We note that our previous suggestion that the plan period should be extended to 15 years to 2041 has been included in the updated document. This is welcomed.

Alignment with the Cotswold Local Plan

BE and BDL supports neighbourhood planning but would question the timing of the CNHP in relation to the emerging Cotswold District Council Local Plan. The concern is that the National Planning Policy Framework (NPPF) states that the CNHP must support the strategic development needs set out in the strategic policies for the area and plan positively to support local development. This would include the polices relating to The Steadings development and any other allocations in the emerging Local Plan.

Should there be any conflict between two development policies the guidance states that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.

The emerging Local Plan will be consulted on in the coming months and will include strategic policies which are likely to relate to areas such as Cirencester and policies which relate to those contained with the current

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draft of the CNHP. There should, as a minimum, be consistency in the approach for particular policies and ideally limited cross over to avoid confusion.

For the above reasons, the CNHP should be progressed in line with the emerging Local Plan, rather than in advance of it, so that both documents are aligned.

The following comments relate to specific proposed policies and whether they meet the basic conditions required at examination.

Policy DBE 1 – Design Quality

In general this policy is supported and it aligns with the NPPF, the existing adopted Local Plan and there are likely to be similar policies in relation to design quality in the emerging Local Plan.

Whilst this is the case, criteria h) refers to building heights and limits this to 12 metres. This is not evidenced and it is questioned why this criteria is needed, especially given criteria f) requires proposals to respect the local distinctiveness. If there is concern regarding height in the town then policies should require a suitable assessment of the impact rather than imposing arbitrary height limits. At The Steadings a site specific assessment was carried out that justified buildings up to 14.5m in certain locations. These heights are approved under the extant planning permission. The policy should allow for such building heights.

The NPPF requires land to be used efficiently and one way to do this is going taller. This can result in highly sustainable and efficient buildings. It does not have to mean lower design quality. This policy should be more open to buildings that are designed for their surroundings and where taller buildings can be justified the plan should be open to this.

On this basis Criteria h) of the policy is not considered to align with policy and guidance and so fails the basic conditions tests for inclusion in the Neighbourhood plan. A simple change would be to remove the height limit and rely on the other criteria under the policy.

Policy DBE 5 – Net Zero & Energy Efficiency… & Policy DBE 6 – Energy Use in Buildings

These policies should be aligned with the Written Ministerial Statement issued on 13 December 2024 in relation to Local Energy Efficiency Standards Update. In this statement Lee Rowley, Minister of State for Housing (at the time) states:

"…the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale…."

Where policies which go beyond building regulations standards are proposed the WMS states that they should be justified through a robust viability assessment. Considering the information submitted in support for and the background documents to the CNHP it does not appear that this viability testing has been carried out.

Therefore it is considered that these policies do not meet the basic conditions required in that it doesn't align with government guidance.

The policies which relate to these matters should be removed from the plan and a reliance placed upon the Building Regulations standards or the proposals should be supported by robust viability evidence to demonstrate that these requirements would not have an adverse impact upon the viability of developments coming forward in Cirencester.

However, the WMS notes that where policies are justified they must be applied flexibly allowing for non-compliance where it is demonstrated that meeting the higher standards is not technically feasible. This is particularly the case in Cirencester which contains a large number of old, historic buildings that are unlikely to be able to be adapted to meet current standards without significant investment and loss of floor area. Therefore, should the CNHP proceed including these policies the policy should be amended to allow flexibility in the application of these standards.

Policy TMN 1 – 20 Minute Neighbourhoods

BE and BDL strongly support the concept of a 20 minute neighbourhood. This may impact on the uses within the Town Centre and a hub and spokes hierarchy to such should be taken. The Steadings has been designed to meet this criteria with schools, facilities and essential retail uses all within easy walking and cycling distances.

Whilst not fully completed at this stage The Steadings will be able to expand the area identified in the draft plan providing community facilities, education, retail, employment and green spaces complying with the principle of the 20 minute neighbourhood. It is suggested that the proposed facilities should be identified as having the potential to enhance the 20 minute neighbourhood principle in the Town.

Siddington School should also be factored into the 20 minute neighbourhood plans. Whilst outside of the plan area it is adjacent to it and offers education provision to children within Cirencester. In addition, Cirencester Park should also be identified for its recreational value in the open space plan.

In other regards, whilst the policies would meet the basic conditions it is not considered necessary for policies which will appear (or do appear) in the Local Plan to be replicated in the CNHP. This includes policies on Air Quality and Noise Pollution.

We trust that the above comments will be taken on board in a constructive manner in order to provide a neighbourhood plan that meets the requirements of the NPPF, including being flexible and deliverable. If you have any questions in relation to these representations please contact Dawn Brodie or Robert Linnell at the above address.

Yours faithfully



Savills

Fisher German LLP
[redacted]

Our Ref: 105181-024

28 May 2026

Cotswold District Council
neighbourhood.planning@cotswold.gov.uk
via email only

Dear Sir /Madam,

Cirencester NDP Regulation 16 Consultation – 16 April to 29 May 2026
Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

NGET assets within the Plan area

Following a review of the above Neighbourhood Development Plan Document, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.

Asset Description
Overhead Transmission Lines: ZF ROUTE TWR (337A - 424B): 400kV Overhead Transmission Line route: COWLEY - MINETY - FECKENHAM - MINETY.

A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.
https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps

NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

New Infrastructure

Demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-carbon generation.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Taking this context into account, In planning for the area the Council should:

- **Safeguard all existing NGET transmission assets**, including overhead lines, underground cables and substations.

[redacted]

- **Support future reinforcement and expansion**, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.
- **Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.**
- **Safeguard existing and potential access routes** required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.
- **Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access**, unless suitable mitigation or alternative agreed routes can be secured.
- **Encourage early engagement with NGET** to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

[redacted]

We would be grateful if you could add our details shown below to your consultation database, if not already included:

Angela Brooks MRTPI, Partner

[redacted]

Tiffany Bates, Development Liaison Officer

[redacted]

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[redacted]

Angela Brooks MRTPI
Partner

For and on behalf of Fisher German LLP

[redacted]

Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Working Near NGET Assets

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgrid.com/document/345326/download

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: https://www.nationalgrid.com/document/349291/download

NGET have produced additional guidance for decision makers on operational noise emitted from existing and planned substation infrastructure. Detail is provided for environmental factors, established acceptable British standards and the 'Agent of Change' principle underpinned by the NPPF. More information can be accessed here: https://www.nationalgrid.com/document/573711/download

Further information on working near NGET assets can be found on the following webpage: https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/working-near-our-assets

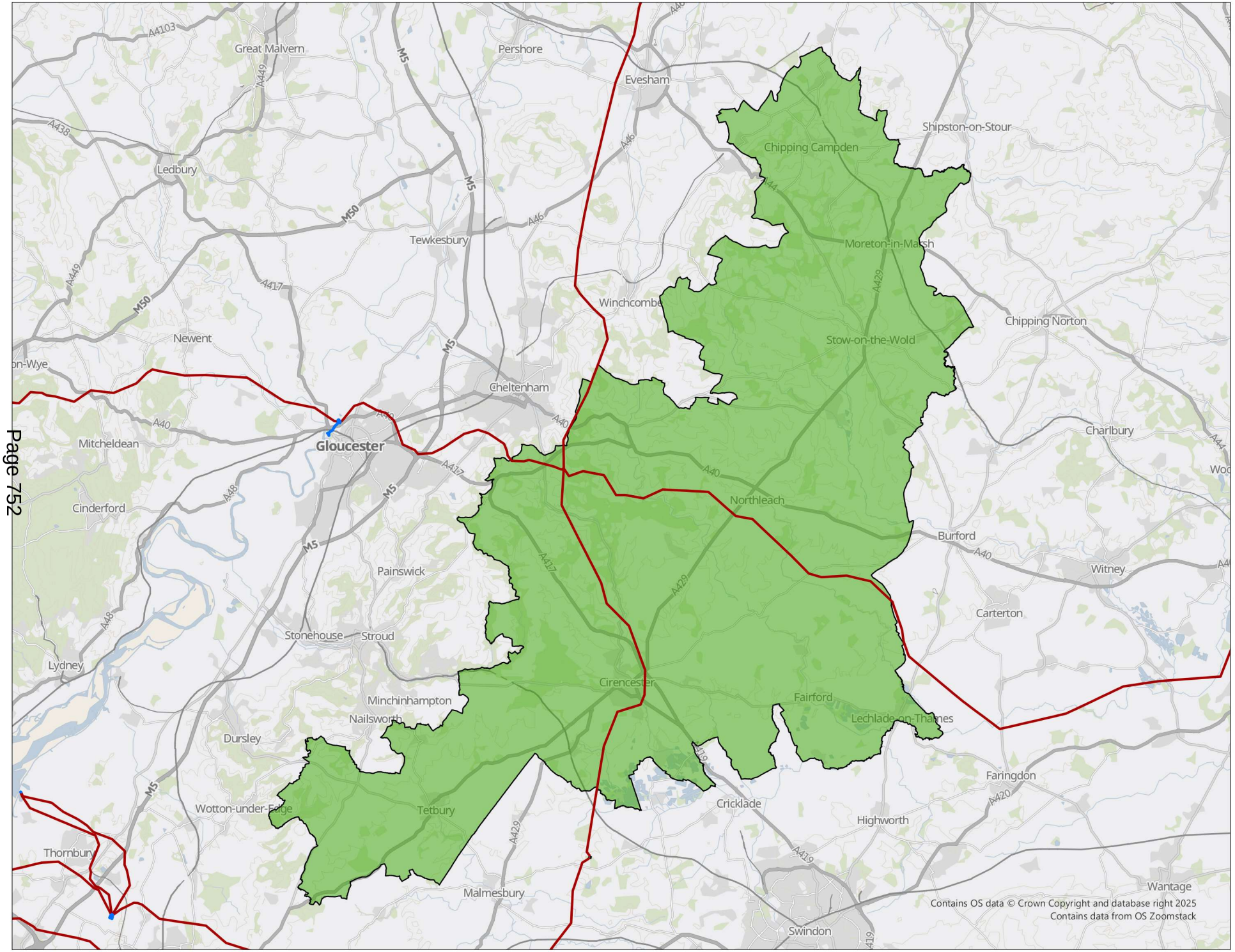
Assessing Electricity Network Infrastructure Applications

Regen, in partnership with the Department for Energy Security and Net Zero (DESNZ) have produced guidance for LPA's on assessing electricity network infrastructure applications. This is intended to be used as a practical tool for officers and details various legislative frameworks and infrastructure components that NGET engage with. More information can be accessed here: https://3477141.fs1.hubspotusercontent-na1.net/hubfs/3477141/DESNZ%20planner%20guides/2026-03-31%20Assessing%20electricity%20network%20infrastructure%20applications%20-%20Regen.pdf

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/

For local planning policy queries, please contact: ngplanning@fishergerman.co.uk



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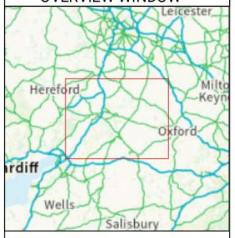

LEGEND:
- Cable
- OHL
- Substation
- LPA Area

REVISION: A

CLIENT: nationalgrid

SCHEME:
PLANNING INTERACTION

TITLE:
LPA ASSET INTERACTION

FP: 105181-024

SCALE: 1:237,000 @ A3
DATE: 20/05/2025

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fisher german

[redacted]

DRAWING REF:
NG-2025-03-MT-OP-LPA- Cotswold

Date: 29 May 2026
Our ref: 546567
Your ref: Cirencester Neighbourhood Plan

Mr Mark Harrison
Cotswold District Council

BY EMAIL ONLY
neighbourhood.planning@cotswold.gov.uk

Dear Mr Harrison

Cirencester Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 16 April 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact:

Yours sincerely
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The Magic[1] website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from the Association of Local Environmental Records Centres .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here[2]. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here[3].

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the Magic[4] website and also from the LandIS website[5], which contains more information about obtaining soil data.

Natural environment issues to consider

The National Planning Policy Framework[6] sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance[7] sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

---

[1] http://magic.defra.gov.uk/
[2] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[3] https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making
[4] http://magic.defra.gov.uk/
[5] http://www.landis.org.uk/index.cfm
[6] https://www.gov.uk/government/publications/national-planning-policy-framework--2
[7] http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here[8]), such as Sites of Special Scientific Interest or Ancient woodland[9]. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed here [10]) or protected species. To help you do this, Natural England has produced advice here[11] to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see Guide to assessing development proposals on agricultural land [12].

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the National Planning Policy Framework. If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory Biodiversity Metric may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the Small Sites Metric may be used. This is a simplified version of the statutory Biodiversity Metric and is designed for use where certain criteria are met. Further information on biodiversity net gain including planning practice guidance can be found here

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's Green Infrastructure Framework sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance[13]).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

[8] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[9] https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences
[10] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[11] https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals
[12] https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land
[13] https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory Biodiversity Metric and is available as a beta test version.

Mark Harrison

From: [redacted]
Sent: 29 May 2026 09:26
To: Neighbourhood Planning
Subject: Comments on Regulation 16 Cirencester Neighbourhood Plan

[redacted]

Dear Mark,

I have some comments on the Regulation 16 Cirencester Neighbourhood Plan dated 2026 ("Plan"). These comments relate only to changes made to the pre-submission consultation (Regulation 14) draft dated January 2024.

04 Aims and Objectives
At the end of each aim and objective text in the form "Policies X, Y, Z and Chapter A and B refer". I cannot find any explanation for this addition in the consultation statement. I assume this means that only those polices, text, and chapters referenced in square brackets are relevant to a particular aim and objective. Conversely, policies and text not referenced are not relevant. Is this your understanding also?

When the steering group started to prepare the regulation 14 draft there was much discussion about its structure, duplication across different chapters, grouping aims and objectives under a single heading, and so on. The steering group prepared for each chapter a table showing the aims and objectives to which each chapter and policy contributed. In the end the advice was not to use include these tables, remove duplication, and allow the plan to be interpreted as a whole. My concern is that introducing the form of words in square brackets into the Plan introduces a more restrictive interpretation of the Plan than intended by the steering group.

If this is the case then the square brackets and contents should be deleted. If the square brackets and contents are for guidance only and do not affect interpretation then this should be made clear.

06 Access and Movement
The diagram shown on pages 42 and 43 is an indicative diagram prepared for an early pre-regulation 14 consultation on the spoke and wheel concept. The intention of the steering group is that the routes supported by the Plan would, as a minimum, be the routes and priorities described in the current or future Cirencester Local Cycling and Walking Infrastructure Plan ("LCWIP") with additions specified in Chapter 06, together the spoke and wheel cycle and footpath network. The diagram on pages 42 and 43 should be clarified to say that it is indicative and does not show the entirety of the spoke and wheel cycle and footpath network.

Policy AM4 - Integrated Mobility Hub
The regulation 14, and earlier, consultation showed strong support to locate the mobility hub at the Old Station site and objection to other locations such as Waterloo and Forum. I believe this should be acknowledged in Chapter 06 of the Plan where the mobility hub is discussed so that it is not forgotten when the mobility hub location is considered.

The Old Station site satisfies the principles to determine the mobility hub location set out in the Plan.

07 Design and Built Environment
Policy DBE5 (a)
The amendment to DBE5(a) distorts the original purpose of the policy and means the policy cannot be satisfied. Therefore the policy is no longer effective and existing legislation would apply.

The purpose of DBE5 (a) in the Regulation 14 draft is to minimise energy consumption and therefore reduce greenhouse gas emissions and energy costs for users of the buildings. This policy was strongly supported with very few objections during the Regulation 14 consultation.

In the Plan the addition of the words "minimise embodied carbon" means the policy cannot be satisfied because it is not possible to minimise energy consumption and greenhouse gases, and, at the same time, minimise embodied carbon. Minimising one means the other is increased, not minimised. For example, minimising energy consumption requires materials used to be increased to provide among other things wall cavities, insulation, double glazing, heat recovery systems, which all increase embodied carbon.

If a policy cannot be satisfied developers need not comply with the policy. Instead developers would comply with current legislation. Paragraph 7.52 acknowledges the current legislation is not sufficient.

The amendment to add "minimise embodied carbon" is not suggested by any consultation response and it should be deleted so the policy works as intended.

The District Council in its Regulation 14 consultation response suggested the embodied carbon should be considered. It the council wishes to make a reference to reducing embodied carbon (which I and others would support) then it should do so while maintaining the original purpose of the policy.

Is it clear that the Construction Environmental Management Plan is to be provided at planning application and not at the start of construction?

Policy DBE5 (e)
This policy has been deleted in the Plan although no consultation response asked for it to be removed.

There is a consultation response (comment 25) which suggests the policy is clarified so that its purpose is clear. A better way to reflect the support this policy received and to respond to comment 25 is to reinstated DBE5 (e)to read "no carbon offsetting will be permitted as a way of meeting this policy". This would allow carbon offsetting to mitigate for impact of construction traffic, for example.

Policy DBE4
The map on page 56 does not show all the non designated heritage assets or their correct location. The map on page 56 should be corrected, deleted, or the reference to the map in Policy DBE4 removed to avoid confusion between the map and Appendix 4. The latter was checked and corrected at the start of 2026.

Best



Mark Harrison

From: [redacted]
Sent: 29 May 2026 12:46
To: Neighbourhood Planning
Subject: Re: Comments on Regulation 16 Cirencester Neighbourhood Plan

[redacted]

Dear Mark,
I have discussed neighbourhood plans with lots of people in recent years and there are a couple of common concerns. The first is that made plans are routinely ignored (or seem to be ignored). The second is what's the point?

I wondered if it would be possible to include an obligation in the plan to prepare an annual report to counter these concerns. It would be good to demonstrate the value of a neighbourhood plan to the community.

I do appreciate it may be late in the day.

Best

[redacted]

[redacted]

Rep #17: GCC

To: Sent via e-mail.

Amartya Deb
Economy, Environment, and Infrastructure
[redacted]

Our Ref: 2026/04/CDC-CNPR16/AD **Your Ref:** **Date:** 29 May 2026

Dear Mark Harrison,

Cirencester Neighbourhood Plan (Regulation 16) Consultation

Thank you for consulting Gloucestershire County Council (GCC) on this matter.

GCC officers have reviewed the materials for Regulation 16 consultation of the draft Cirencester Neighbourhood Plan in Cotswold District. Officers are broadly supportive of many policies in the plan. Highlights of officer suggestions include:

- Reference to extreme heat and sustainable design of buildings
- Aiming for better air quality in line with EU and WHO standards
- Contributing to Net Zero through active travel, car clubs and public transport
- Opportunities in movement of goods and freight

GCC officers of transport planning would welcome further engagement and discussions on the policies AM1 and AM4 in the draft plan.

Officers also offer some suggestions where the navigation of the plan document (c. 140 pages) could be improved through better signposting.

Detailed officer-level comments are as below.

Yours sincerely,

Amartya Deb
Senior Planning Officer
Gloucestershire County Council

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DETAILED OFFICER COMMENTS

Archaeology

The aims and objectives, Policy TC1 and its underlying principles, and several other policies including, *inter alia,* DBE1, DBE2 and DBE4, will all serve to help protect the historic environment of Cirencester. Therefore, the plan is welcomed.

Climate Change & Air Quality

GCC officers welcome the robust climate policies detailed throughout the Regulation 16 draft of Cirencester Neighbourhood Plan. Officers find it encouraging to see some of the aspirations to go above and beyond national legislation.

02.The Cirencester of Tomorrow

On car use, it is detailed in **paragraph 2.9** that car dominance in Cirencester is high. Advocating for **electric vehicle (EV) car clubs** and/or developer contributions towards **on-demand bus services such as GCC's "Robin"** (where development is of sufficient scale to support this) will help meet travel demand, reducing reliance on private car ownership. As outlined in the draft neighbourhood plan, car dominance in Cirencester has brought with it negative consequences for health, safety, air quality and congestion.

Officers acknowledge car clubs and on-demand buses are outlined in **Policy AM4 – Integrated Mobility Hub**. Also, **paragraph 6.24.5** specifically mentions car clubs.

- **See also Transport Planning comments on Integrated Mobility Hubs.**

Policy AM6 – Sustainable & Active Travel

Policy AM6 on page 41 details a **"travel hierarchy",** however the reader is not told where this is in the document – it is later found on page 48 under **paragraph 6.24** and is hard to identify. This also includes reference to an energy hierarchy on page 52, which is then later found under **paragraph 7.60** on page 61.

05. Cirencester Town Centre and Areas of Distinctive Character

GCC officers strongly support principles of "Green to the Core" and "Flexibility and Multi-Functionality" (as outlined in page 38).

- *Climate Resilient Design*

GCC officers note increased rainfall intensity with climate change is refenced (paragraph 10.49). In addition, officers would **encourage further reference to** climate resilient design, particularly **extreme heat.** The Gloucestershire Climate Vulnerability Risk Assessment (CVRA) has identified future increased frequency and intensity of heatwaves in the county. The elderly are particularly vulnerable to the impacts of extreme heat. Within the Cotswolds, the Office of National Statistics has identified the number of people aged 65 to 70 years, rose by 31% between 2011 and 2021. In Gloucestershire, the number of people aged 65+ between 2018 and 2043 is projected to increase by 52.5%.

- *Wildfires*

The CVRA highlights a projected increase in the **incidence of wildfires** across Gloucestershire. As a recent instance, the assessment notes, how during August 2022, in Cherington (Cotswold District) a wildfire spread across 50 acres of farmland. Plan makers may wish to take appropriate measures in protecting buildings and natural areas that are exposed to such risks.

07. Design & Built Environment

As outlined in **paragraph 7.52** of the draft neighbourhood plan, the Future Homes Standard only mandates a 75-80% carbon reduction on existing emissions and not carbon neutral development. Given the climate emergency declarations made by Gloucestershire County Council, Cirencester Town Council and Cotswold District Council, GCC officers understand that achieving net zero development is critical to meeting targets. Therefore, GCC officers strongly support **paragraph 7.50** and find aspirations to achieve higher standards to meet net zero commitments particularly encouraging.

Policy DBE5 – Net Zero & Energy Efficiency Measures in the Design & Construction Process

Clarification on the scope of Construction Environmental Management Plans (CEMPs) may be needed. Typically, CEMPs are required for major developments

e.g. 10 or more dwellings, commercial development over 1,000m2 or sites larger than one hectare. Usually, CEMPs will not include references to net zero design or construction, nor energy efficiency within them. They, however, will include construction site details, roles and responsibilities for the site, environmental controls for noise, dust, water, emissions etc., during construction, monitoring and reporting for construction, community engagement and construction regulatory compliance.

GCC officers strongly support the outlined details of Policy DBE5. Officers feel, the inclusion of green infrastructure here may be beneficial for air quality, biodiversity, and microclimate. For example, planting of deciduous vegetation can provide shading and cooling in summer and maximise solar gain in winter. Cheltenham Borough Council have produced a Net Zero and Planning Supplementary Planning Document which may be of use here.

On EV charging – EV charging infrastructure is encouraged (and ideally above the thresholds set by the Building Regulations Approved Document S).

GCC officers would welcome further emphasis that active travel should be prioritised over EVs. E.g., officers suggest the inclusion of cycle storage with new residential development, and the inclusion of showers, lockers dry/changing rooms with business development where active travel is a viable transport option.

Whilst officers appreciate comments regarding unfavourable cycling conditions in Cirencester on **page 20** of the draft neighbourhood plan, Gloucestershire County Council is implementing a phased, four-year rollout of 20mph speed limits in residential areas, town centres, and village hubs, starting in 2026/27 which will help bring safer roads for active travel. Additionally, we should also be mindful of growing e-bike and e-scooter use which allows people to travel greater distances compared to conventional cycling.

DBE6 – Energy Use in New Buildings

Section (a) of **DBE6**, states *"new residential developments should not use fossil fuels on-site for space heating or hot water provision".* GCC officers strongly support this policy particularly on grounds for air quality, environmental and health concerns.

The Future Homes Standard continues to permit use of wood-burning stoves as a secondary heat source. GCC officers of air quality do not encourage this due to associated health and environmental impacts. Local authorities across Gloucestershire are actively pursuing both behavioural change initiatives and policy interventions to discourage the use of wood burning.

7.51 – all domestic private rented homes will need to be at least EPC C by 2030.

7.66 – On climate change, HMOs can be vulnerable to removal of vegetation, and replacement with hardstanding/artificial grass to mitigate landlord/tenant garden maintenance needs. Reference to the importance of vegetation, particularly for biodiversity, but also heat resilience (again in light of our CVRA identifying increased

extreme heat in Gloucestershire) may be prudent. **Section c) of policy NE3** of the draft plan is appreciated in this regard.

6.19.5 – GCC officers would encourage consideration towards secure cycle parking here, alongside toilet, changing room and locker facilities to support multi-modal transport options.

Policy WBC1 – Air Quality

Policy WBC1 and page 99 on air quality are strongly supported. We particularly welcome reference to health concerns and particulates, notably how wood burning contributes significantly to particulate matter levels, alongside vehicles (including electric vehicles). Looking at the 2021 census data, of all the district, city and borough councils within Gloucestershire, the Cotswolds had the second highest reported levels of wood burners as their only heating source. Despite a lack of particulate matter emissions data in the county, due to a multitude of associated adverse health impacts, more action is needed to ensure we are protective of existing, and future occupier health.

Officers support the reference to an **"Air Quality Neutral Standard"**. Please note, Gloucestershire County Council has been advocating for adoption of EU air quality targets (i.e., annual average nitrogen dioxide is not to exceed 20µg/m3) which is more stringent than current UK air quality targets (i.e., not to exceed 40µg/m3).

Other local authorities have begun adopting EU targets to ensure they continue to be protective of local population health. In Gloucestershire, this includes Cheltenham Borough Council and Gloucester City Council.

The World Health Organisation (WHO) has an even more stringent target (i.e., not to exceed 10µg/m3).

In Cotswold District, 25% of monitoring sites in 2025 exceeded EU levels. When considering the WHO levels, this was 81%. More specifically for Cirencester, a list of monitoring sites with EU and WHO exceedances is as below:

Monitoring Sites exceeding EU levels for nitrogen dioxide:

- Abbey Way Junction

Monitoring Sites exceeding WHO levels for nitrogen dioxide:

- London Road
- Lewis Lane
- Stroud Road
- Bartonbury Lodge, Stroud Road
- Tetbury Road (O/S Steading Cottages)

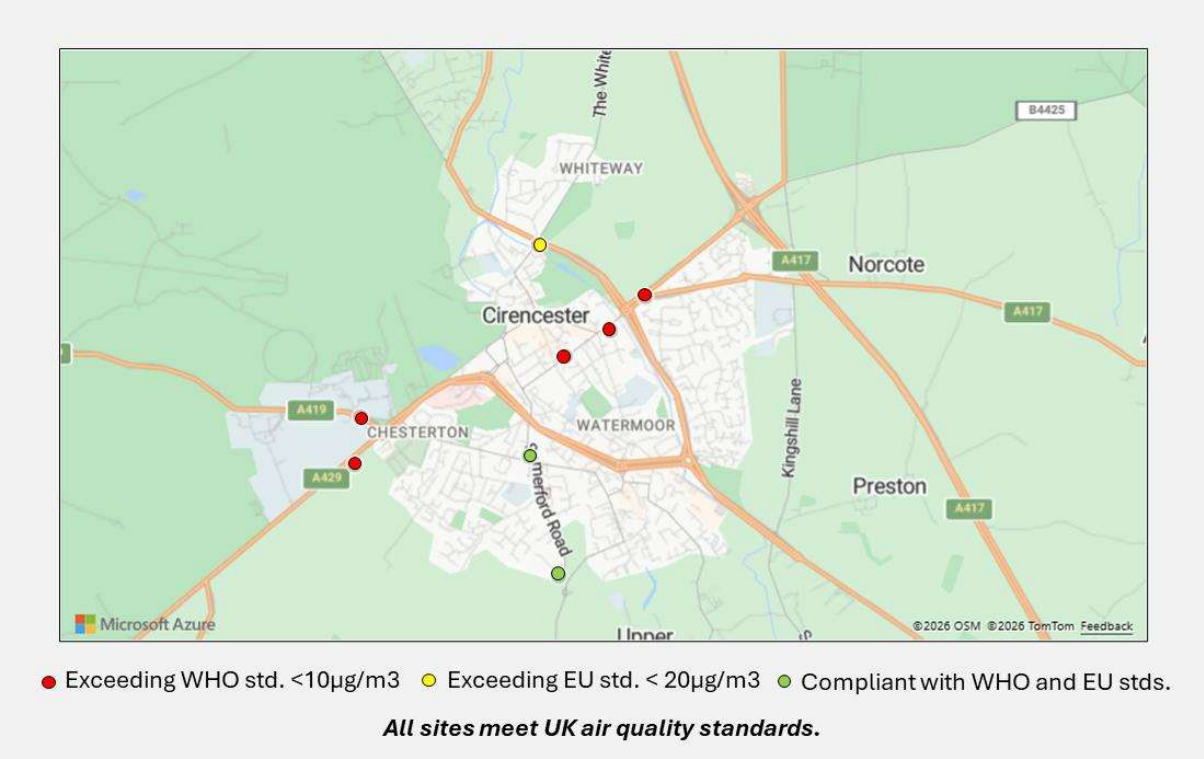


Fig. 1. WHO and EU exceedances in Cirencester. Source: GCC officers based on Air quality monitoring dashboard | Inform Gloucestershire. Please note, data is based on an annual average and for nitrogen dioxide only.

Ecology

10. The Natural Environment

GCC officers welcome the comprehensive and well thought through chapter 10 on the Natural Environment. We have the following observations to make.

In February 2026, GCC adopted the Gloucestershire Local Nature Recovery Strategy (LNRS). More information on the LNRS can be found here: Gloucestershire Local Nature Recovery Strategy | Gloucestershire County Council

Furthermore, in March 2026, Sections 98 and 99 of the Levelling-up and Regeneration Act (LURA) 2023 came into force. This now means that there are additional legal compliance requirements for neighbourhood plans.

Section 98 of the LURA states the following:

(b) take account of any local nature recovery strategy, under section 104 of the Environment Act 2021, that relates to all or part of the plan area, including in particular —

(i) the areas identified in the strategy as areas which –

(A) are, or could become, of particular importance for biodiversity, or
(B) are areas where the recovery or enhancement of biodiversity could make a particular contribution to other environmental benefits,

(ii) the priorities set out in the strategy for recovering or enhancing biodiversity, and
(iii) the proposals set out in the strategy as to potential measures relating to those priorities.

The most current PPG Paragraph: 046 Reference ID: 8-046-20250219 Revision date: 19 02 2025 provides further detail on to "have regard" to Local Nature Recovery Strategies in plan making, which could help support your decisions on how to 'take account' of the LNRS until further updates are confirmed by the new NPPF and PPG (possibly this summer).

GCC officers recommend that plan makers review the natural environment chapter in light of these recent changes and use the Gloucestershire LNRS as evidence base.

GCC officers inform that there are going to be significant changes Biodiversity Net Gain delivery coming soon meaning that it will only be applicable to larger development sites and NSIPs. There are several references to "deliver biodiversity net gain" through the document such as Principle 20. Plan makers may wish to review if statements such as this are relevant within the BNG planning context.

Libraries

GCC officers have no further comments to make.

Minerals and Waste Planning

GCC officers have no further comments to make.

Public Health and Communities

GCC officers have no further comments to make.

Transport Planning

06. Access & Movement

GCC officers welcome the welcome the focus with the draft Cirencester Neighbourhood Plan to create a convenient, robust, and flexible network of streets and spaces that promote all modes of active travel leading to **reduced reliance on private vehicles**.

GCC officers are **supportive of the need for enhanced public transport, increasing safe pedestrian and cycle access** generating more opportunities for permeability to existing and new development, avoiding connections which are

historically hindered by highway barriers and gaps in walking and cycling routes, recognised in draft Cirencester Neighbourhood Plan policies.

- *Public transport & active travel*

In respect to transport and the movement of people, the Regulation 16 draft of Cirencester Neighbourhood Plan recognises the challenges of poor public transport provision and over-reliance on cars for transport and the impacts to road safety, **congestion at peak hours** (A417 and A429) and **major events creating noise and air pollution** and the "ring road effect" limiting permeability to walk, wheel and cycle due to limited accessible suitable crossing points.

The draft neighbourhood plan supports other transport options alongside car use and to promote active travel, specifically the Local Cycling and Walking Infrastructure Plan (LCWIP) for Cirencester. The draft plan highlights the need for safe cycling routes from the town into the countryside, specifically the strategically important route to Kemble Station, and the limited safe routes to the west and south (the Cotswold Lakes) for commuting, connecting schools and residential areas, cycling and walking long-distance routes.

The draft plan provides a positive framework, and it is great to see the LCWIP referenced and supported. This **could be strengthened further** by safeguarding future strategic walking and cycling links – particularly connections to Kemble, the town centre, education and employment. Development proposals should demonstrate how they integrate with and extend the wider network, not operate in isolation.

<u>Policy AM1 – The Cirencester Spoke & Wheel Cycle and footpath Network</u>
<u>Policy AM4 – Integrated Mobility Hub</u>

Whilst offering broad support in principle, GCC officers are **unable to comment in detail** on proposals for **integrated mobility hub and a '20-minute neighbourhood' model** approach and the 'Cirencester spoke & wheel cycle and footpath network' model approach across the whole of Cirencester in the draft neighbourhood plan policies. **GCC officers would welcome detailed engagement and agreement on these model approaches.**

- *Carbon emissions*

GCC officers are **supportive of facilitating a reduction in carbon emissions** and contributing to achieving the national goal of net zero.

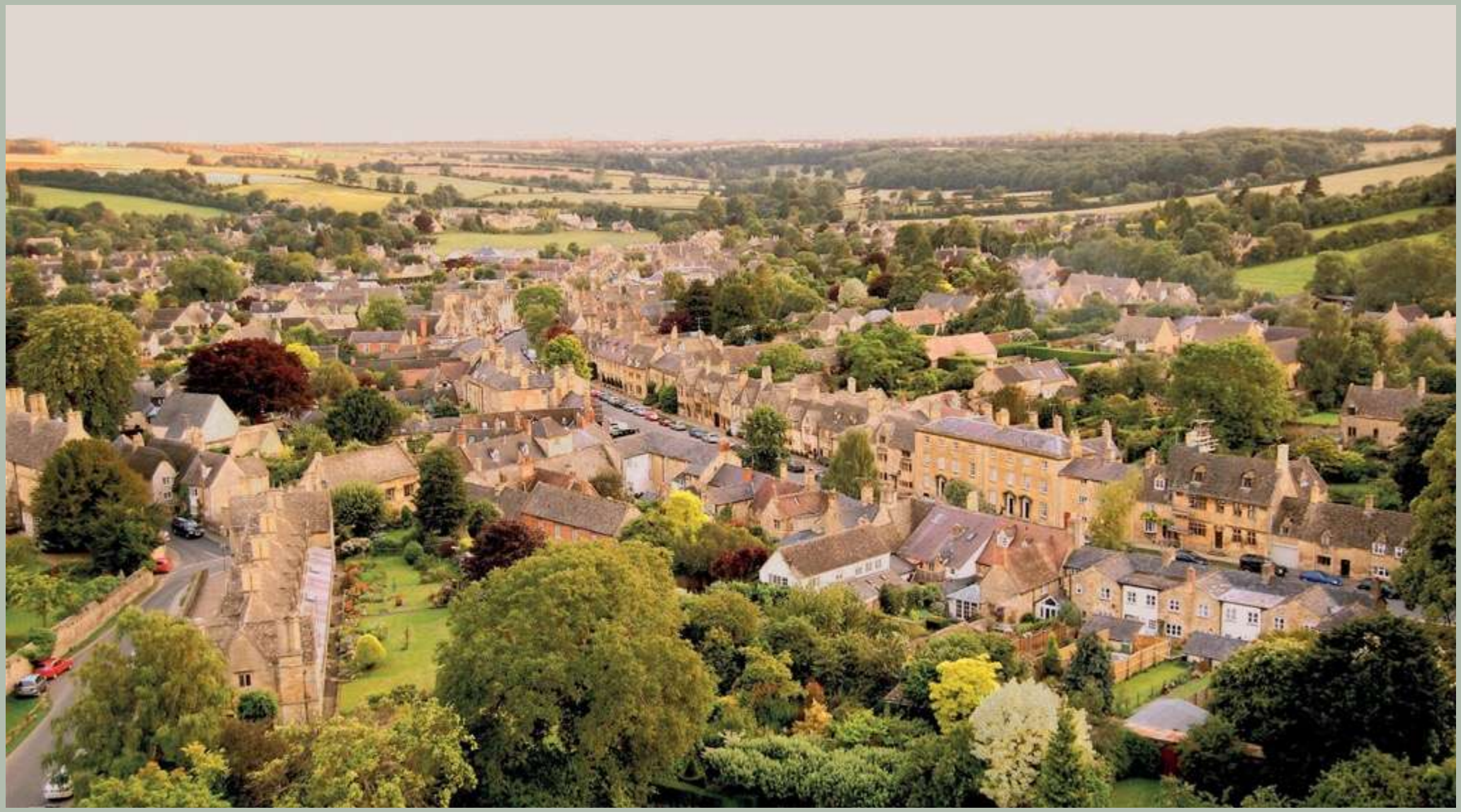
We see the draft neighbourhood plan policy for the protection of existing, and delivery of new easily safe accessible community infrastructure, which include services, to support the future sustainable growth of Cirencester that enhances the natural environment and protects green and blue spaces to be in line with the draft neighbourhood plan's transport policy.

GCC officers support the **rebalancing of travel** within the plan area and connecting schools and residential areas to the centre and to each other and the creation of new walking and cycling links, bus stop and Real-time passenger Information (RTPI) infrastructure and Kemble Railway Station enhancements supported by new development and other funding opportunities.

The draft neighbourhood plan identifies the need for well managed sustainable tourism as there is no allocated coach facilities in Cirencester for which GCC officers offer support in principle.

- *Goods and freight*

The **draft neighbourhood plan has not identified** the movement of goods, freight and logistics in terms of existing movement, alternative fuels for freight (including coaches) future growth and carbon management and tourism related peaks in demand. There may be opportunities for parcel delivery lockers at interchange hubs for example.



Chipping Campden Parish Neighbourhood Development Plan (CCNDP) 2023 - 2031

Regulation 15 Submission Version 4th March 2025


Noel Arms Hotel

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This document and supporting appendices and other evidence can also be viewed on our website at www.chippingcampden-tc.gov.uk/



Foreword and acknowledgements

The Chipping Campden Neighbourhood Development Plan (CCNDP) has evolved over a decade or more and there are several reasons for this. Prominent among these have been the desire to take account, where possible, of the differing views held by residents of the parish. Many, if not most, of our residents have a strong emotional attachment to the settlements of Chipping Campden and Broad Campden. This is hardly surprising – the town is a jewel in the Cotswolds – while both have a unique history and architecture which fuels a natural wish to protect this wonderful heritage.

It is important we recognise we cannot stand still and try to prevent any changes to the main settlements and wider parish. In fact, to do so will gradually harm what we seek to protect. We must do our best to improve our services, support our businesses, and enhance employment opportunities and ultimately our quality of life.

In that regard, it is important to understand two things about the CCNDP.

The first is that the CCNDP is a tool. It does not dictate to planners what they can and cannot do when making planning decisions. Our CCNDP does not have the authority to do that. But what it does constitute is a compendium of information about our town, and an indication of the wishes of our townsfolk regarding future development. Cotswold District Council can refer to the CCNDP to help make their decisions in a way that is most suited to us. You will see that there is a good deal of "technical" language in the CCNDP, and that is precisely because it has been prepared for an expert planner to read.

The second important point is that the CCNDP is not fixed for all time. It is a document that can and should evolve. What seems appropriate now may not be so in due course, and of course there may be elements of the CCNDP that you would have framed differently. Once a NDP is adopted it can still be changed at a later date if there is a will to do this.

Many people have been involved in bringing the CCNDP to this stage, too many to individually mention here. Nonetheless, we would like to acknowledge and say thank you to all of those who have spent a considerable amount of their time helping to secure a positive future for their community through this document.

Chipping Campden Town Council


CHIPPING CAMPDEN

Introduction













Introduction

by Chipping Campden Town Council

The Chipping Campden Parish Neighbourhood Development Plan (CCNDP) is based on the provisions of the Localism Act 2011, which allows local communities to form a shared vision for their area's future. Chipping Campden Town Council (CCTC) has been responsible for leading the plan-making for Chipping Campden Parish with significant support from an advisory group, Cotswold District Council, local societies residents and organisations.

The CCNDP seeks to address the issues identified by the local community during community consultations carried out by the Town Council since 2014. It contains planning policies to help ensure that future developments in Chipping Campden Parish are of a high quality, will protect and enhance the environment of the Parish, Chipping Campden, and Broad Campden; provide adequate housing and parking, and support local employment. It also includes 'Community Proposals' which are projects and actions that are not planning policies but which the community wishes to pursue.

It is supported by a 'Community Design Guide' (CDG), a separate document comprising design guidelines to inform and encourage anyone proposing development in the Parish to create developments which complement and enhance the area's outstanding architectural and environmental qualities.

Local people and groups have been engaged throughout the process, resulting in the accumulation of an "evidence base" for our plan.

The CCNDP has been prepared to comply with the requirements of government policies and guidelines, particularly the National Planning Policy Framework (December 2024 amended with minor changes in February 2025) and the Cotswold District Local Plan 2011 - 2031

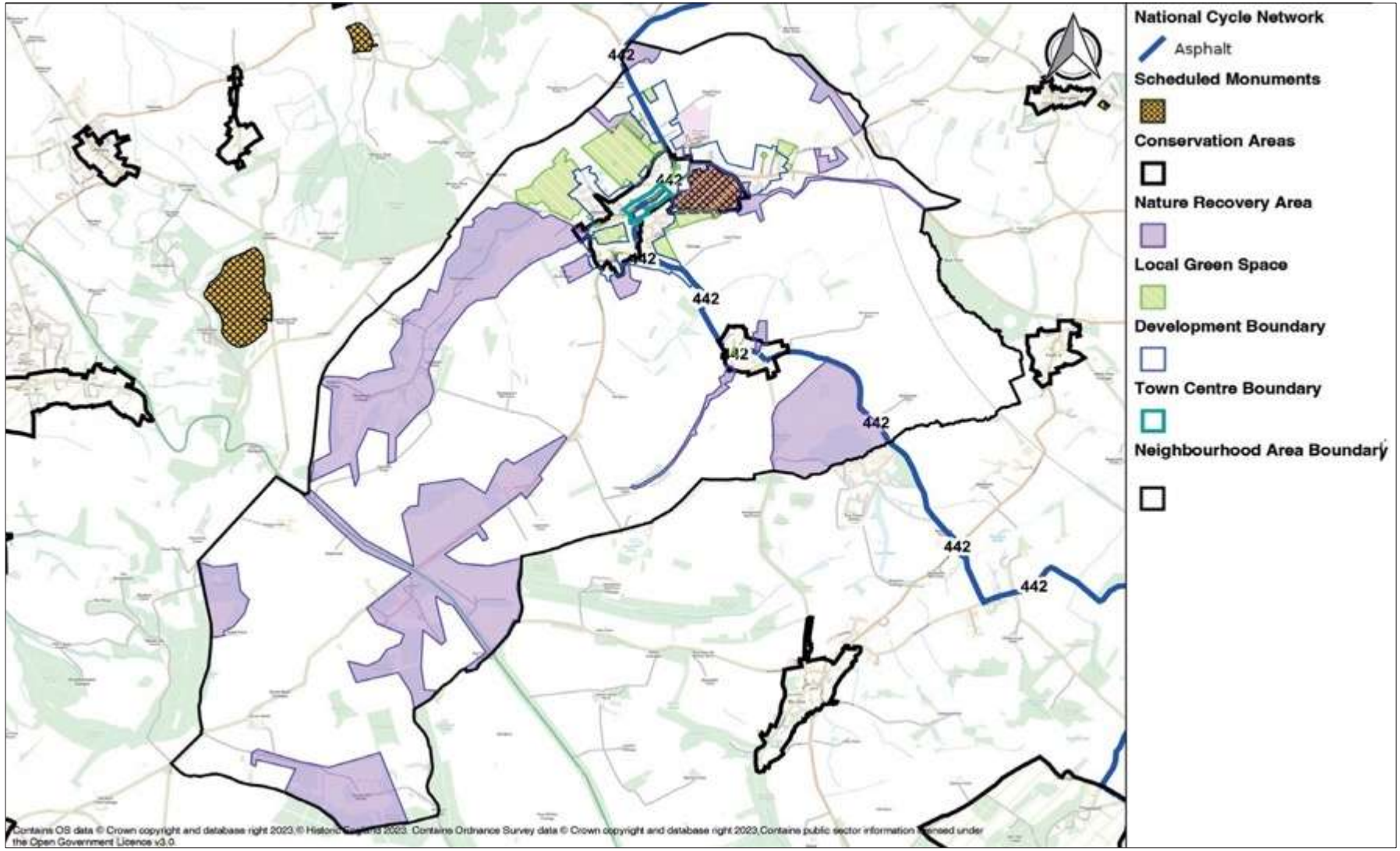


Consultation

Consultation processes have included the following

- "Your town needs you" letter sent to all parish households 5.11.2013
- CCNDP survey sent to all households in parish 20.11.2013
- Survey on CDC SHLAA proposals sent to all households 15.3.2014
- Public exhibition of CDC SHLAA sites 19.3.2014
- Drop-in event regarding parking 2.6.2014
- Meeting with residents to form CCNDP team 10.7.2014
- Draft proposals for business strategy sent to all local businesses 29.8.2014
- Discussions with Campden Business Forum Sept-Dec 2014
- Survey of proposed housing development sites sent to all households Jan 2015
- Public exhibition of CDC Local Plan 17.2.2015
- Public meeting to discussed town's response to Local Plan 17.2.2015
- Meeting with CDC Highways 27.4.2015
- Meetings with various local landowners 30.8.2014-22.9.2015
- Drop-in event for residents to give feedback on CCNDP proposals 5.3.2016 and 12.3.2016
- Meeting with CPRE regarding environmental considerations for CCNDP 13.4.2016
- Meeting with Principal of Chipping Campden Academy to discuss future secondary school provision 2.5.2016
- Invitation to local primary schools to discuss future primary school provision 3.5.2016
- Draft CCNDP published on town council website 20.3.2017
- Public exhibition in town hall of CCNDP and supporting documents 21.4.2017
- Letters to all household regarding LGS proposals 30.9.2017
- Letters to landowners regarding LGS proposals 30.9.2017
- LGS proposals placed on Campden Hub 1.10.2017
- Parking Survey. CC Business Forum 2017
- CDC discussion re CCNDP proposals 16.8.2022 & 23.9.2022
- Meeting with Campden Society 1.9.2022
- Letters sent to LGS landowners, September-November 2022
- CDC confirmation Design Guide accepted 6.12.2022
- Consultation with Cotswold District Council September / October 2023
- Parking Survey. CC Town Council November 2023
- Regulation 14 Consultation between 6th March and 20th April 2024

Key Diagram for the Chipping Campden Parish NDP



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Chipping Campden Parish Neighbourhood Plan Area

Neighbourhood Plan Period

The CCNDP supports policies in the Cotswold District Local Plan 2011 – 2031. The CCNDP period is tied to the local plan and covers the period to 2031. Where local plan policies change some of the policies in this CCNDP may become out of date and a review of the NDP would be justified.

Chipping Campden Parish Neighbourhood Area

The Chipping Campden Parish Neighbourhood Area is based on the boundaries of Chipping Campden Parish as determined by Cotswold District Council on 14th February 2014 (see Figure 1).

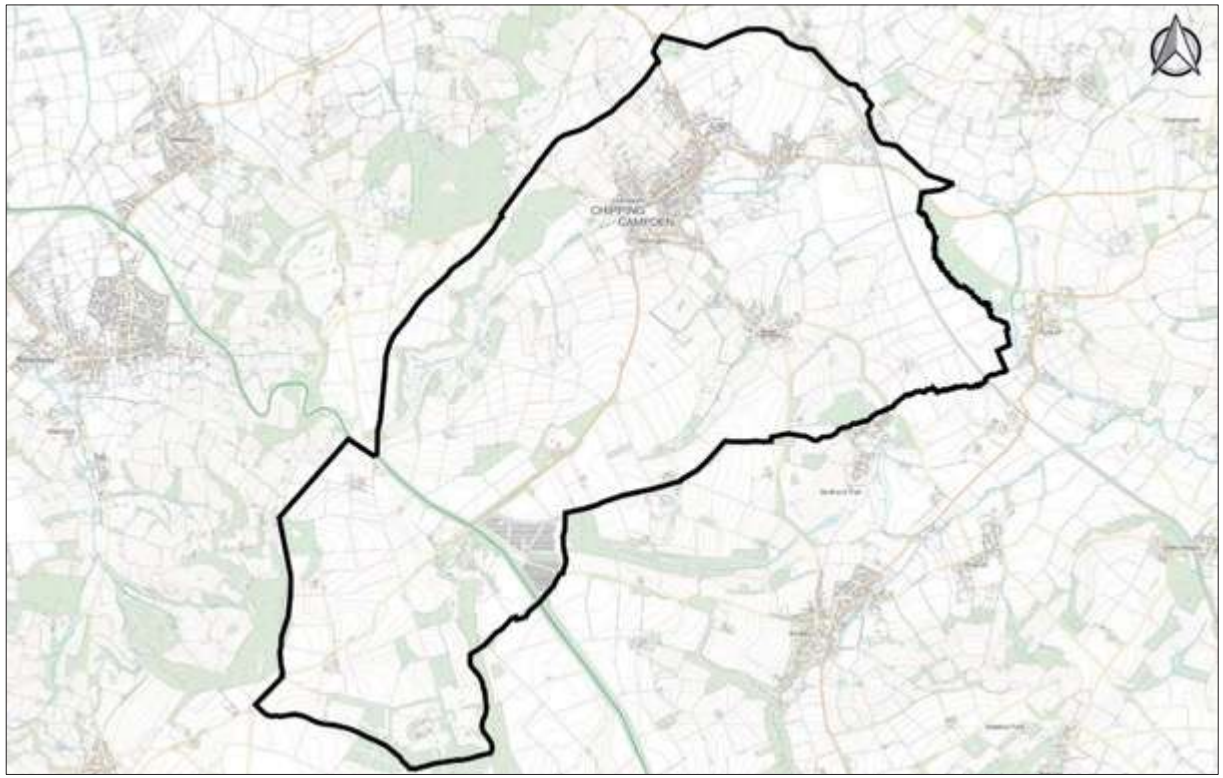

Fig 1. Chipping Campden Parish Neighbourhood Area
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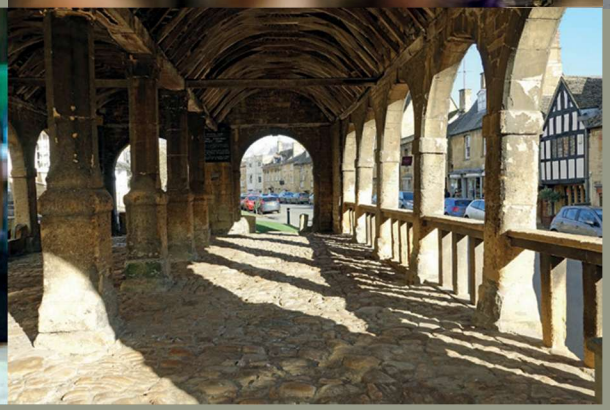
Vision for
Chipping Campden Parish





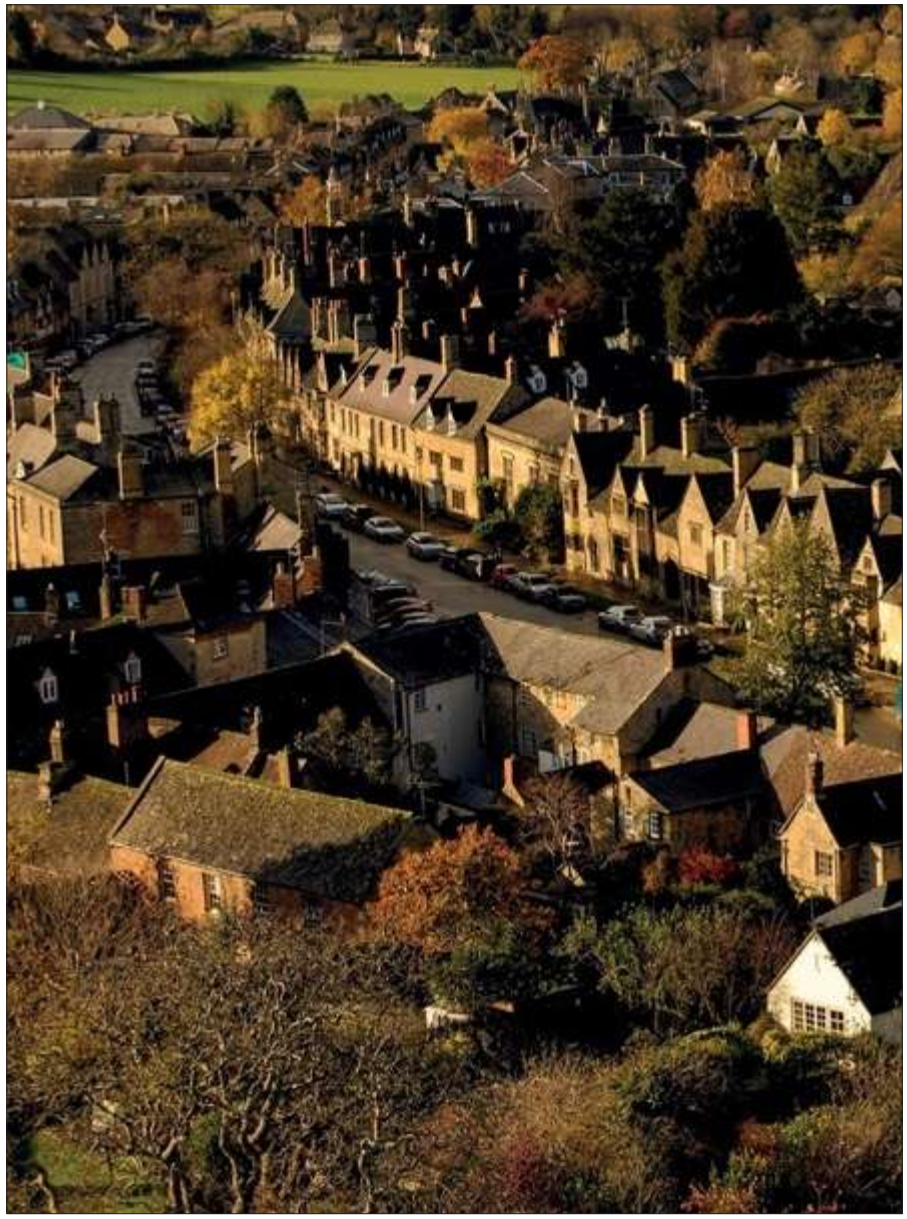






Our vision for Chipping Campden, often described as “The Jewel of the Cotswolds”, is that it will continue to be:

‘A vibrant rural community, renowned for its creativity, culture and commerce, as much as for the beauty of its buildings, agriculture and natural surroundings. Our aim for the CCNDP is to foster a society working together to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents to promote wellbeing, and amenities for all visitors to the area. A beautiful natural and built environment within the Cotswolds National Landscape that provides safe and accessible housing for all residents where the historic legacy is preserved.’



Objectives

The CCNDP sets out a strategy for development both of the town centre and of the parish as a whole. To achieve our vision, the CCNDP has identified objectives within six themes:

- Environment and Sustainability
- Housing
- Economy
- Design
- Facilities, Services and Amenities
- Traffic and Transport

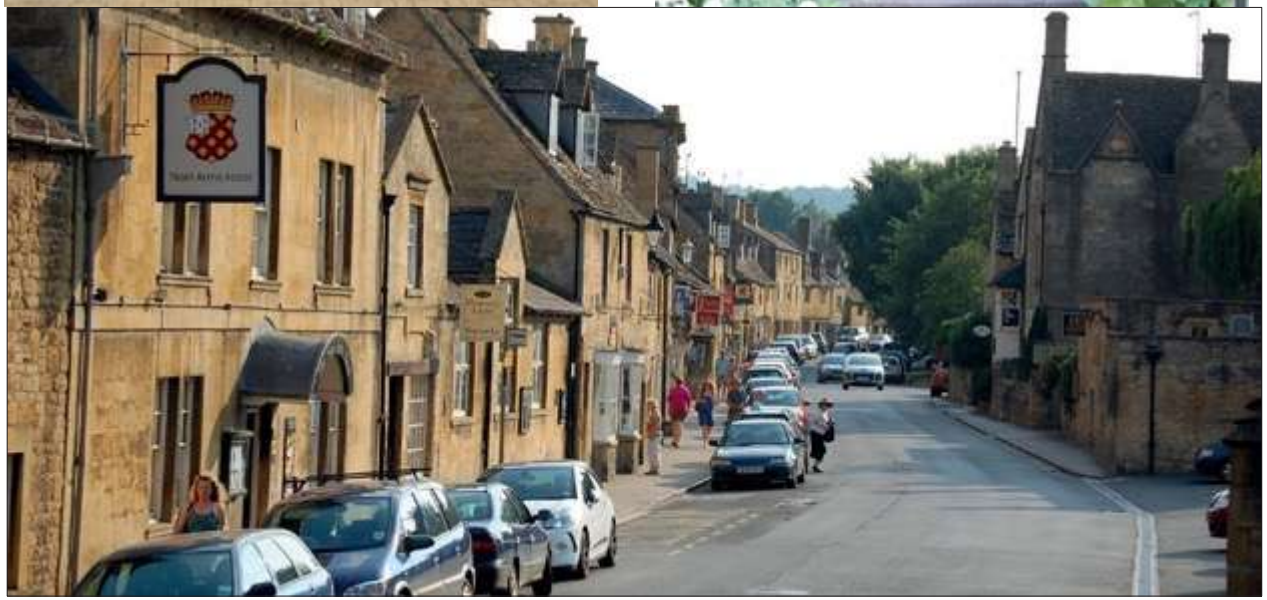
Environment & Sustainability	Housing	Economy
To conserve and enhance the natural environment, and encourage a wide diversity of flora and fauna	To ensure that the community has an appropriate range and supply of housing to meet its needs, including affordable and social housing developed in sympathy with the existing townscape and surrounding countryside	To protect and develop the town's economy
To conserve and enhance the natural setting that characterises the parish	To ensure that new housing location is consistent with the environmental objectives noted above, and is designed in accordance with the design objectives below	To strengthen the vitality and viability of the town centre by protecting and enhancing the range of retail, hospitality and other commercial offerings
To provide and / or maintain green corridors for wildlife across and around the parish		To improve the tourism offer and the parish's attraction to tourists and visitors by improving existing facilities and introducing new ones
To meet the challenge of climate change, flooding and light pollution		To ensure that there is an appropriate balance between rental accommodation for tourists and that which meets the needs of residents and their families
		To support the development of specialist food and food-related industry and businesses
		To support the local agricultural industry

Design	Facilities, Services and Amenities	Traffic and Transport
To protect and enhance the parish's heritage assets and its location within the Cotswold National Landscape, by encouraging development and conservation projects for uses that are sympathetic to the character of Chipping Campden and Broad Campden and their beautiful landscape setting and resisting developments for inappropriate uses, or that are unsympathetic to the character and setting of the settlements	To ensure that the community has appropriate infrastructure in terms of health services, sports / leisure facilities, amenities, public transport and green infrastructure	To improve facilities for car parking
To manage impacts brought about by climate change and flooding using natural capital and management	To protect existing green spaces and to increase the provision of green spaces	To improve the facilities and safety for cyclists and pedestrians

Where it is not within the power or resources of the Town Council itself to achieve these objectives, it will encourage and support to the best of its ability all efforts by public bodies, commercial entities, individuals and others to achieve the objectives.







Historic and present-day context







Overview

Chipping Campden is an architectural gem, having a very high density of listed buildings, many dating from the Middle Ages. Its mellow, honey-coloured façades have earned it the nickname of "the Jewel in the Crown of the Cotswolds", and its High Street has been described as "the most beautiful in all England"[1].

Sir Nikolaus Pevsner, the renowed architectual historian, described Chipping Campden as 'the best piece of townscape in Gloucestershire, arguably one of the best in England'.

1 GM Trevelyan

Following the grant of its Market Charter in 1185, Chipping Campden's economy has centred around agriculture, particularly the wool trade in earlier times. Then, in the early 1900s, the Arts and Crafts Movement and CR Ashbee' 'decamped' to the town, giving rise to a variety of creative industries.

Chipping Campden Parish, the Neighbourhood Area, lies within the Cotswold National Landscape (formerly the Cotswold Area of Outstanding Natural Beauty or AONB). There are two conservation areas within the CCNDP area, one in Chipping Campden and one in Broad Campden. Chipping Campden Parish contains 5 Grade I, 22 Grade II* and 228 Grade II 'list entries'. Campden House formal garden and associated medieval cultivation earthwork is a scheduled monument. Spring Hill House, at the southern-most part of the parish is an 18th century landscape park and is registered as a Park and Garden of Special Historic Interest.

Alongside its traditional agriculture and creative industries, Chipping Campden Parish now supports a variety of light industries, and it is a major draw for tourists on account of its beautiful natural setting, heritage and architecture.
In addition, it is home to the world-renowned Campden BRI food research centre which provides consulting, technical and legal advice for the food industry as a membership organisation, which fits well with the agricultural and market history of the town.

A world-class Music Festival is the highlight of a thriving cultural scene throughout the year. The town also hosts a popular Literature Festival, the Robert Dover's Games / Cotswold Olimpicks and the Scuttlebrook Wake. Chipping Campden has a highly regarded Academy school with a long and distinguished history dating back to 1440. The school has now developed a performing arts centre which is supporting expansion of the town's well-established cultural festivals.

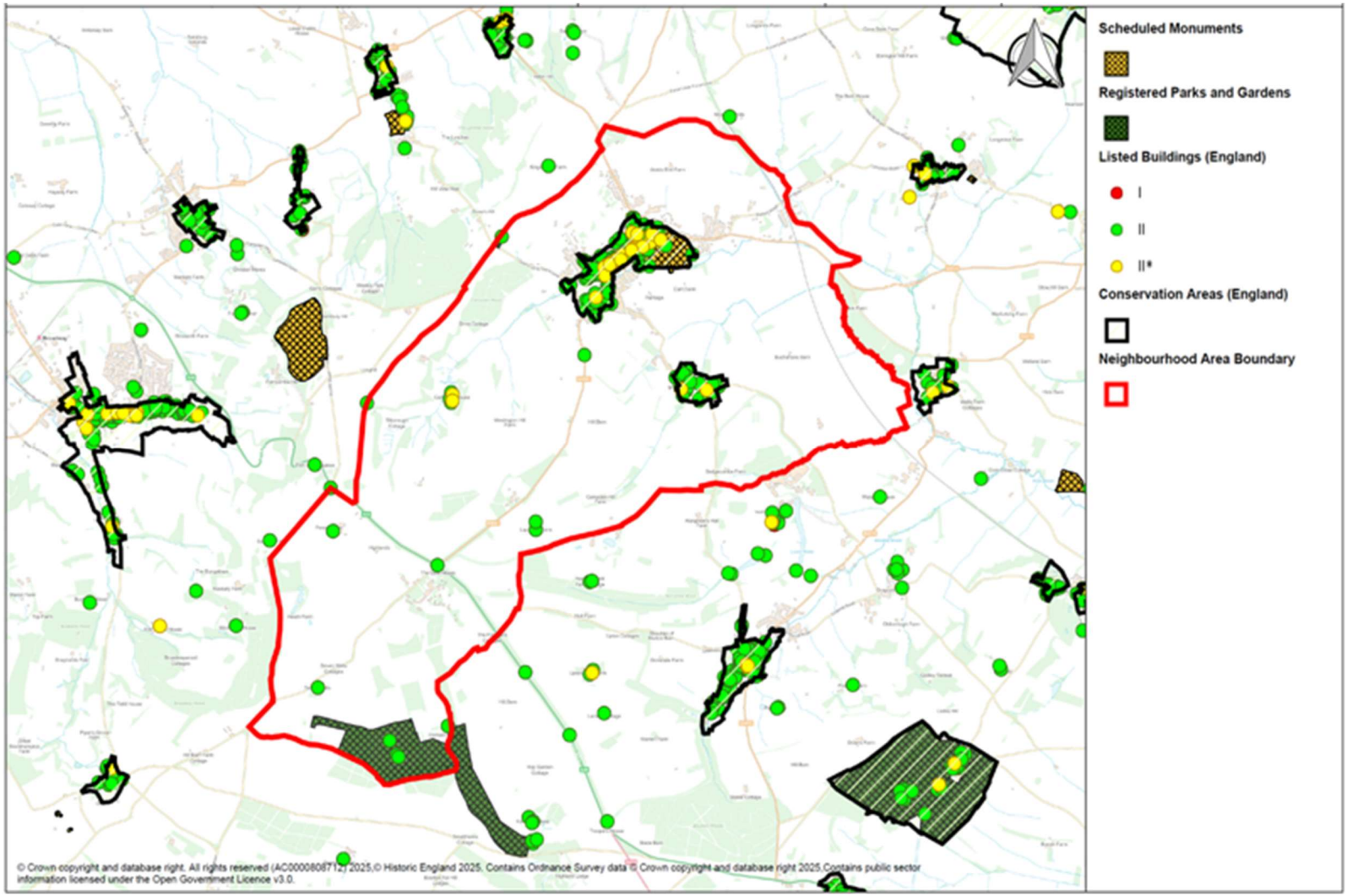
The town is very popular as a base for undertaking long distance walks, being the start of the Cotswold Way long distance footpath, and on the Monarch's Way and the Heart of England long-distance footpaths. These named walks and the many other footpaths in the countryside around the Town provide magnificent views into the town and out towards the rolling Cotswold countryside.

Chipping Campden





Figure 2: Chipping Campden Parish historic features



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Chipping Campden

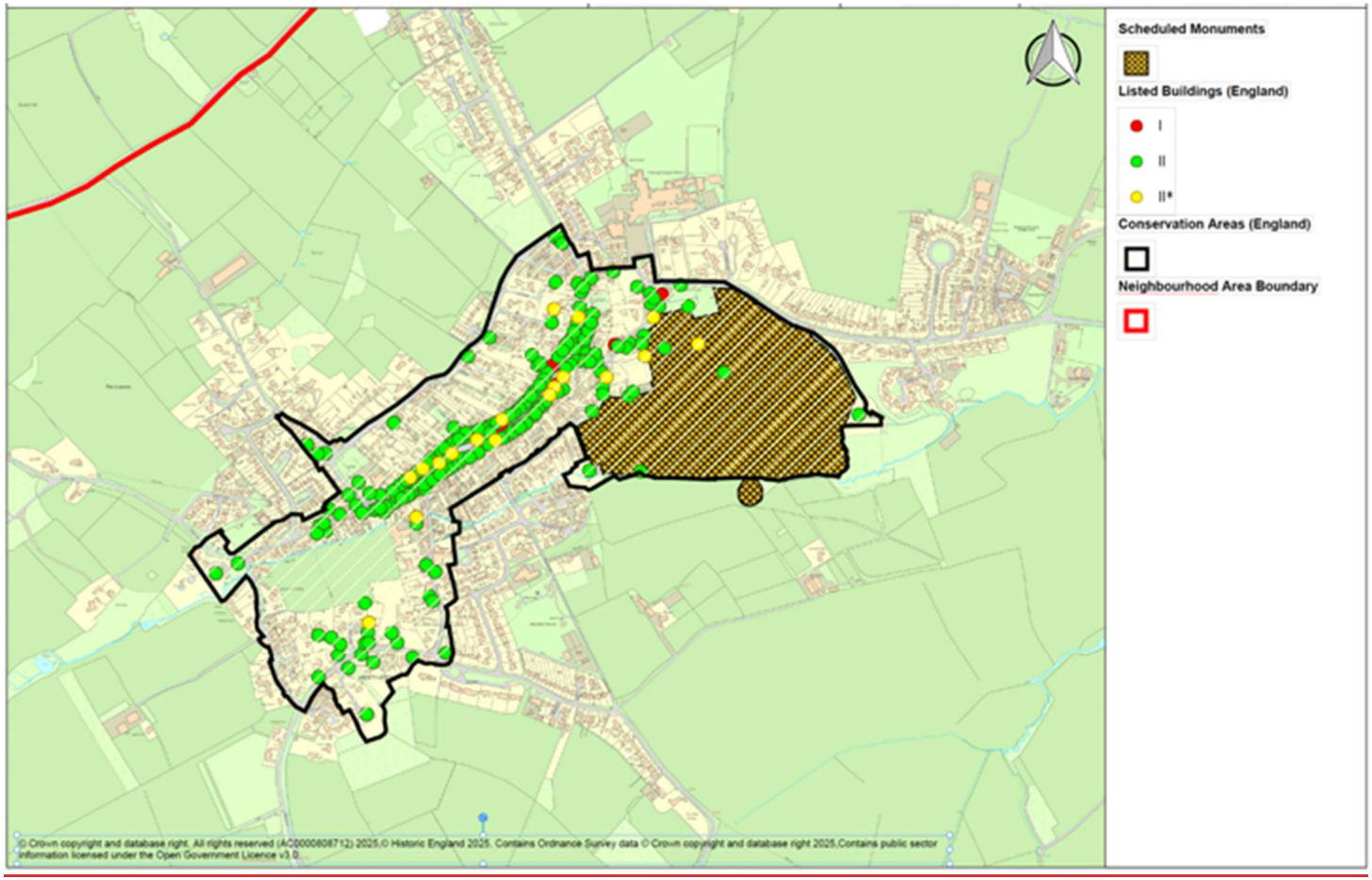
Figure 2, above, shows the nationally designated heritage assets of Chipping Campden Parish, and **Figure 3** shows them for Chipping Campden town in greater detail, illustrating its exceptional historic built environment. These features include listed buildings, Scheduled Monuments, and Conservation Areas, all of which are formally designated heritage assets. The High Street is dominated by Grade I (yellow dots) and Grade II (green dots) listed buildings. The black outline shows the extent of the conservation area.

The remains of Old Campden House are designated as a Scheduled Monument (brown hatching): the history of this exceptional feature can be seen on the Chipping Campden History Society website and it is currently available for hire from the Landmark Trust.

The site itself contains a number of listed buildings and structures including Old Campden House, East and West banqueting houses, tithe barns and stables, and the remains of a formal garden and associated medieval cultivation earthworks.



Figure 3: Historic Features – Chipping Campden inset



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Broad Campden

Broad Campden is a village which also contains noteworthy and beautiful historic buildings. **Figure 4** shows the locations of Grade I listed buildings (yellow dots) and Grade II listed buildings (green dots) scattered throughout the settlement, creating a charming and intimate historic setting within the Conservation Area (black outline).

Broad Campden is a unique settlement that retains a separate identity and building style from Chipping Campden.

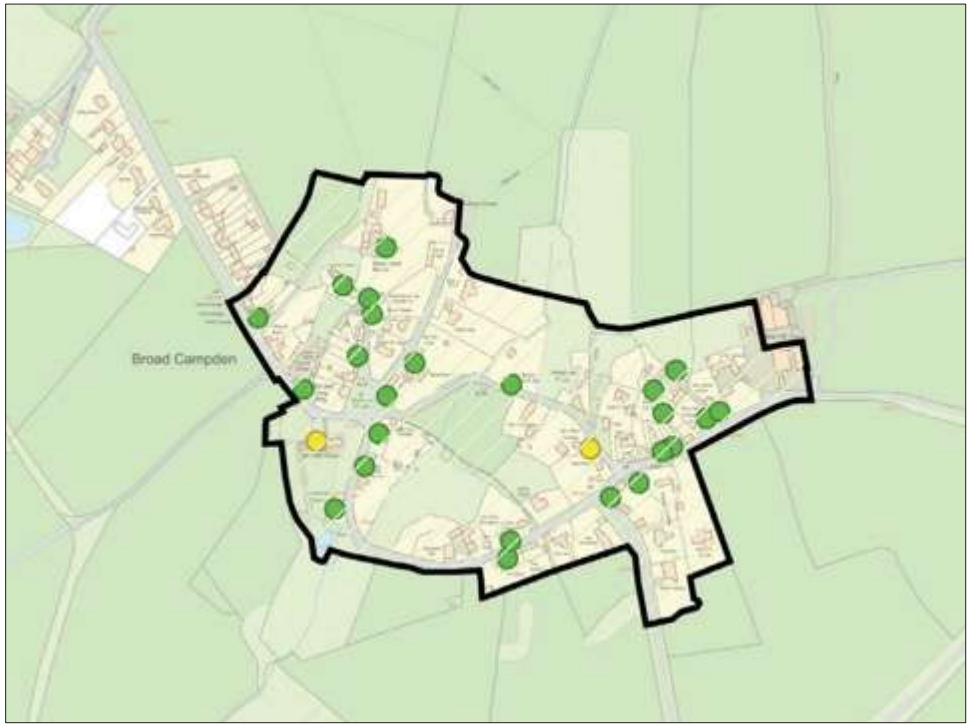


Figure 4: Historic Features – Broad Campden inset
Source: Andrea Pellegram Ltd, under OS licence AC0000808712







Creative industries and the local economy

Chipping Campden hosts a very wide variety of creative industries that add to and define the local economy. Though the parish is very rural in nature, commerce is not dominated by agriculture but rather by tourism and the creative industries.

The Arts and Crafts movement drew many artists to Chipping Campden. According to the Campden online website[1], Chipping Campden became known as a centre for the Cotswold Arts and Crafts movement early in the 20th Century, following the move of Charles Robert Ashbee with the members of his Guild and School of Handicraft from the East End of London in 1902. The Guild of Handicraft specialised in metalworking, producing jewellery and enamels, as well as hand-wrought copper and wrought ironwork, and furniture.

A number of artists and writers settled in the area, including F.L. Griggs, the etcher, who built Dover's House, one of the last significant Arts and Crafts houses, and set up the Campden Trust with Norman Jewson and others, initially to protect Dover's Hill from development. H. J. Massingham, the rural writer who celebrated the traditions of the English countryside, also settled near the town.

Another main contributor to Chipping Campden's creative economy is from the Campden BRI[2] which is a leader in global food and drink science and research, possessing both the knowledge and practical expertise to deliver results that safeguard businesses and unlock opportunities.

The historical influences of the Arts and Crafts Movement, arguably anti-technology, and the Campden BRI which embraces it, have together created a fertile environment for creativity and innovation in the local economy which is dominated by specialisms in food and drink, artisans and makers, and music.

The beautiful Cotswold stone buildings in the parish date back to the Middle Ages when Chipping Campden was a wool trading centre, and for centuries after the town has benefited from the patronage of wealthy wool merchants. Agriculture remains a major component of the local economy, and the parish a farming community; albeit sheep farming has generally declined over recent decades. The main crops grown currently are winter wheat, oilseed rape, and spring barley, with the areas of maize and set-aside increasing. Forthcoming plans for the parish should ensure the protection of the agricultural industry, which not only provides food but an attractive backdrop to the to the town.

[1] https://www.chippingcampdenonline.org/ [2] https://www.campdenbri.co.uk/






Chipping Campden
APPLE JUICE


Cotswold House





Campden BRI

The Cotswold Local Plan Policy EC4 (Special Policy Areas) supports the growth and development of the Campden
BRI site (which is mainly outside the neighbourhood area) and the adjacent Camden Business Park. These are strategic policies and therefore not suitable for the neighbourhood plan to comment upon, but the impact of the BRI and the opportunities for growth and innovation on the Business Park, allow for the local economy to grow, thrive and innovate. Much of Chipping Campden's economy is tied to the success of these enterprises.

Food and drink

As discussed above, the tourism market generates demand for, and supports, the need for eating and drinking establishments so that residents enjoy a much wider range of gastronomic opportunities than they might otherwise.

In 2023, there were 21 different eating and drinking establishments, shown in **Appendix 1**, ranging from cafes, restaurants and bakeries to cooking schools.

Artisans and makers

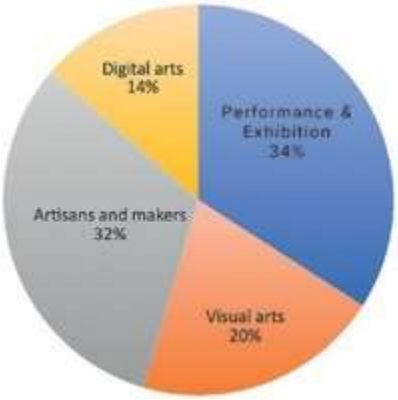
Many Chipping Campden Parish residents are artisans and makers in the "art of things": floristry, bespoke shoemaking, jewellers, printing, fabric design, glass making and pottery. In 2023, there is also a thriving performance and exhibition community.

In 2023, there were the following commercially active organisations, plus many more semi-professional and amateurs: 12 organisations that specialised in performance and exhibition; 10 "visual artists" including painters and photographers; 13 artisans and makers including jewellers, printers, florists and textile designers; and three digital designers and publishers.

The full list of organisations and individuals is provided in **Appendix 1.**

Most of these creative industries are based in private homes or small business units: many are located on the High Street. The CCNDP policies on the town centre are therefore highly relevant.

In addition, Chipping Campden provides marketing space for these industries in a regular weekly food market (Country Market) and monthly craft and gift market (Campden Market), held in the Town Hall, and also regular craft markets in the Market Hall.



Music & Literature

Each May, some of the world's top classical musicians come to perform at the Chipping Campden Music Festival. The festival lasts for two weeks and, apart from the stellar list of leading performers, a feature of the second week is the Festival Orchestra, reconvened each year and comprising of young musicians just starting their professional careers, paired with experienced professionals. The orchestra gives three full performances, each featuring a renowned soloist. The festival was started in 2002 and has always been run by local people and supported financially by a loyal group of patrons and friends, originally all local but now expanded due to the international reputation of the festival. Most concerts are completely or nearly sold out; audiences in the most recent festivals totaled around 4,500 each year.

Alongside the music festival is a Literary Festival hosted in the Cidermill Theatre. Another cultural highlight of Chipping Campden is its traditional Morris dancing, which dates back centuries and is still thriving today. Campden Morris are a local group who perform lively and colourful dances at events throughout the year, particularly around May Day and during the town's celebrations.

The natural environment

Chipping Campden Parish sits in the midst of some of England's most iconic countryside in the Cotswold National Landscape. The settled areas of Chipping Campden and Broad Campden are contained by steep hills from which a number of vantage points offer beautiful views, the main high points shown as stars are shown in **Figure 5**.

Detailed information published in 2017 about Chipping Campden Parish's environment can be found in **Appendix 2**. Here, it is sufficient to say that the River Cam which runs across the parish and through the Chipping Campden town is subject to flooding with large areas in Zones 2 and 3.

There are also patches of ancient orchard and notable woodlands. Flooding and woodlands are illustrated in **Figure 6**. There are no nationally designated sites of special scientific interest or other nationally designated nature sites in the parish though there are immediately outside.





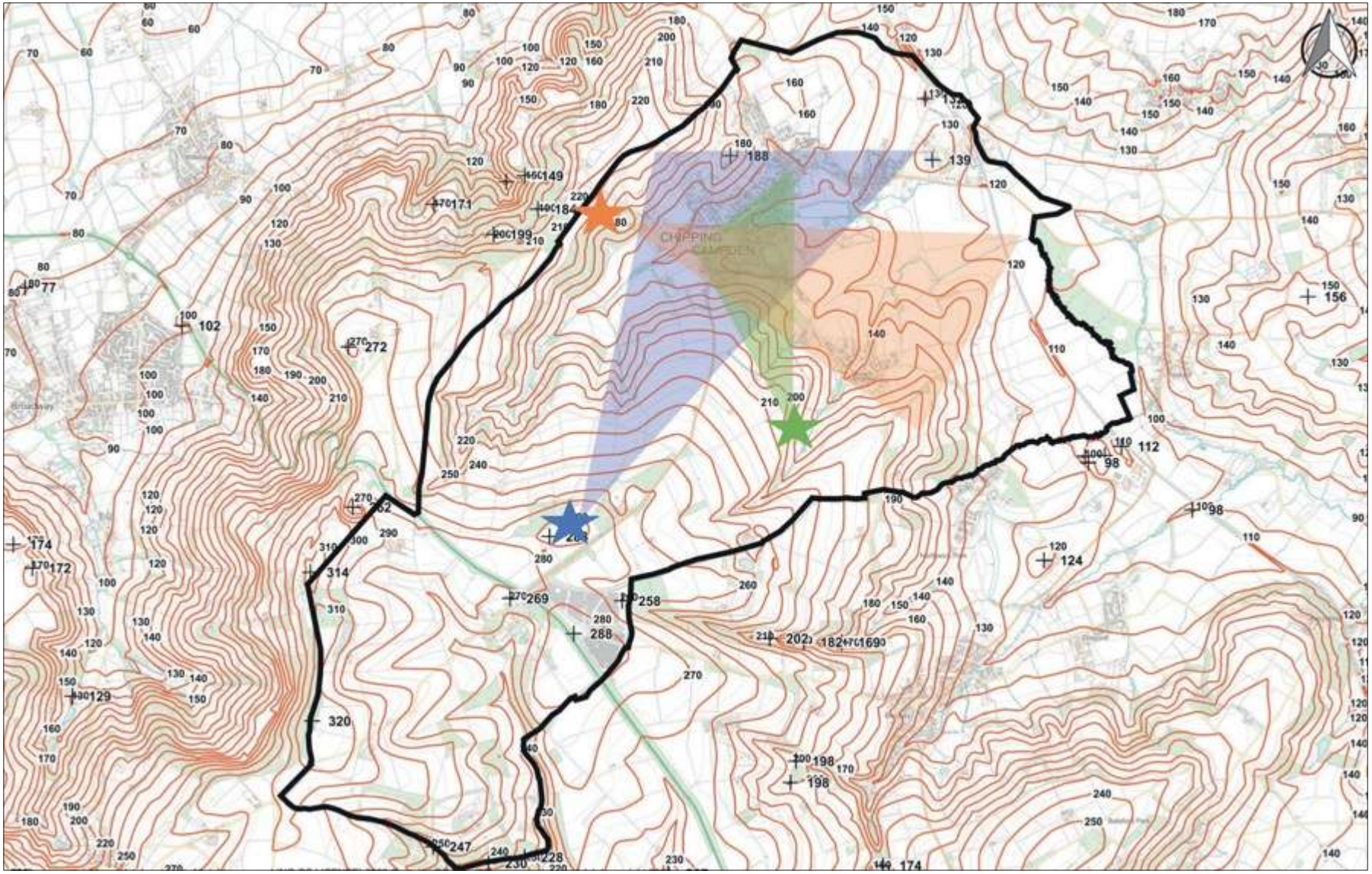


Figure 5: Topographical map of Chipping Campden Parish neighbourhood with key views

Source: Andrea Pellegram Ltd, under OS licence AC0000808712

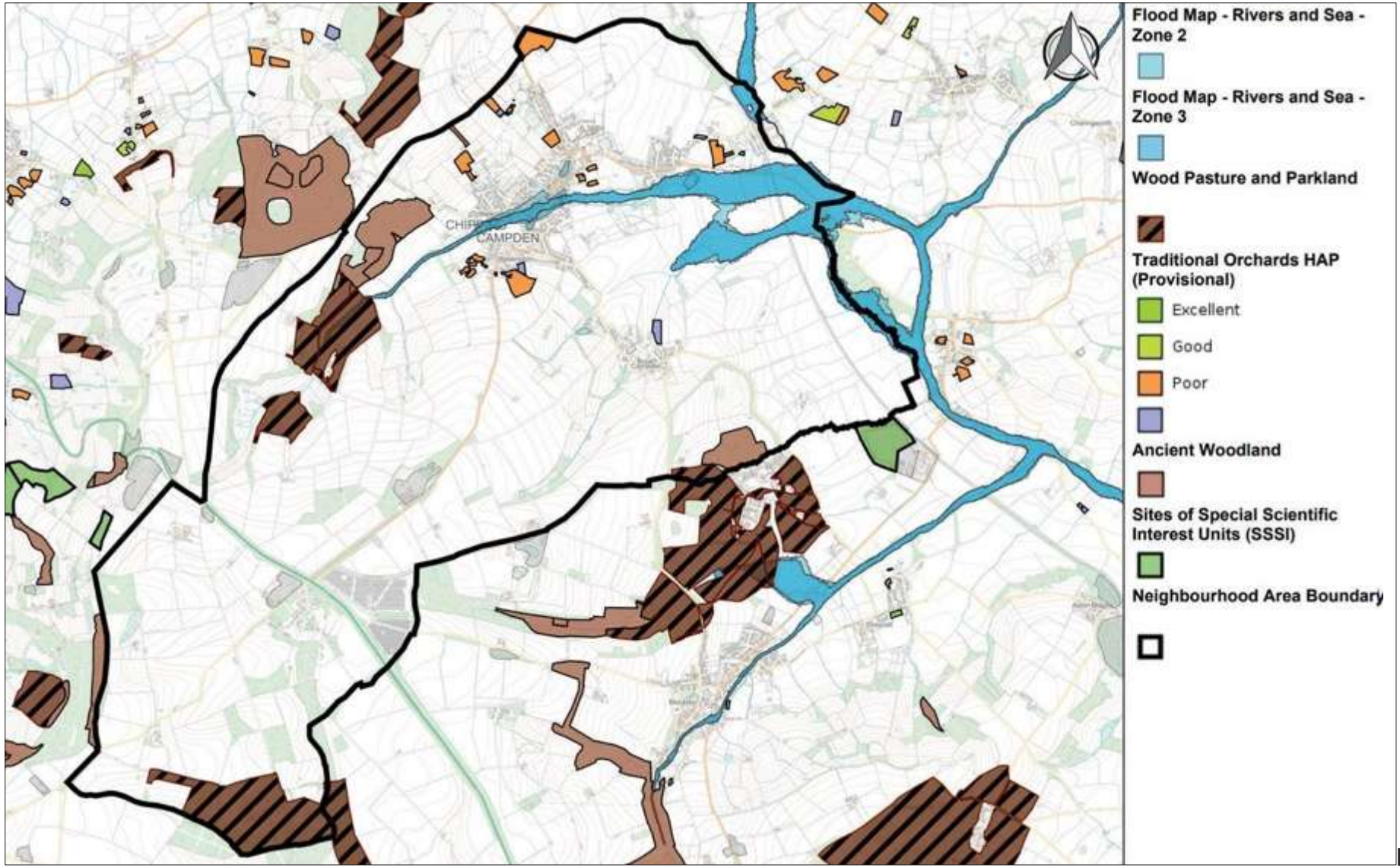


Figure 6: Flooding and woodlands in Chipping Campden Parish
Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Population characteristics

The Census 2021 (see **Table 1**) shows that the population was 2,400 living in 1,100 households. The population is older than for the UK as a whole with a lower proportion of people aged 15-49. Around 92% of residents were born in the UK and are 98% white. The proportion of population who are school children is relatively lower than for England (14% students in Chipping Campden Parish compared with 20% in England).

Chipping Campden Parish has a higher proportion of one and two person households compared to England as a whole and household composition is dominated by one person households (35%) and single-family households (62%). Household deprivation is lower than for England and general health is good.

Housing is dominated by houses and bungalows (91%) with only 8% of the population living in flats. The proportion of houses with 1-3 bedrooms is lower than for England as a whole but there is a much higher proportion of homes with 4 or more bedrooms (33% in Chipping Campden Parish compared with 21% for England). Since households are generally smaller, and homes are generally larger than for England, it is expected that the occupancy rating for bedrooms (having more bedroom than is strictly necessary for the number and type of occupants) shows that there is and “excess” of bedrooms indicating that some older single people are occupying large homes.

Most homes are owned outright which is much higher than for England as a whole (49% for Chipping Campden Parish, 33% for England), social renting is on par with England, and there is a lower amount of private renting.

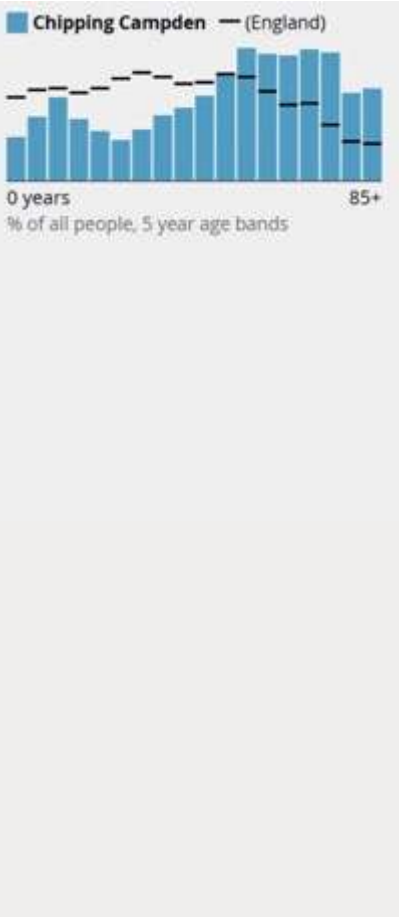
Chipping Campden Parish is a rural parish and is not accessible to major employment locations by train – there is support for a new train station which will be discussed below. Chipping Campden Parish shows a lower level of economic activity than for England (Chipping Campden Parish has 49% of the population as economically active compared with 57% for England) and 41% of these people work mainly from home. For those who travel to work, the majority tend to work locally.

The dominant occupations are as managers/directors (27% which compares to 13% in England) and professionals and associated professionals. Socio economic classifications show higher values than for England.

Table 1: Key Indicators from the Census 2021 for Chipping Campden Parish and England

Source: www.ons.gov.uk/visualisations/customprofiles/build/

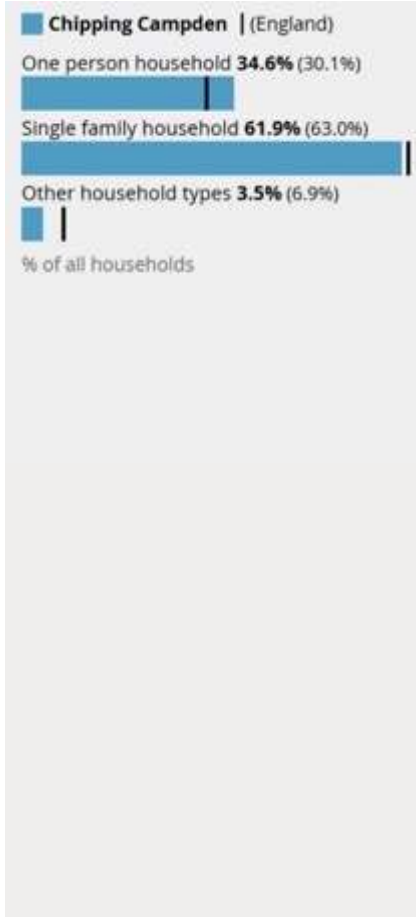
Age Profile



Household Size



Household Composition



Household Deprivation



General Health



Number of Bedrooms



Occupancy Rating for Bedrooms



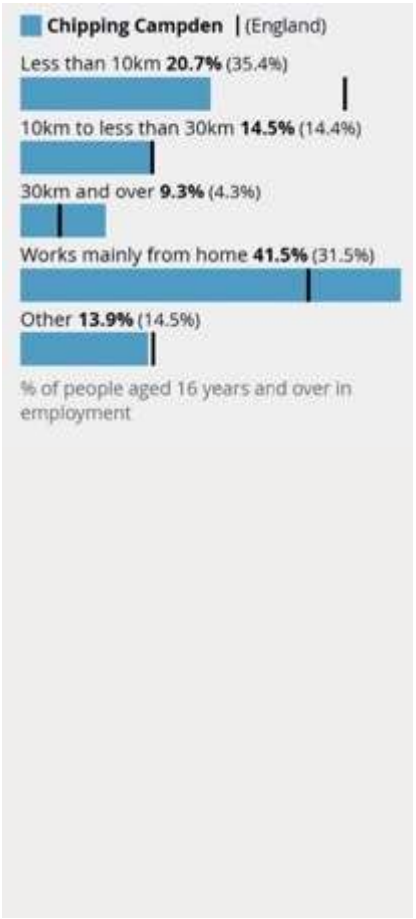
Tenure of Household



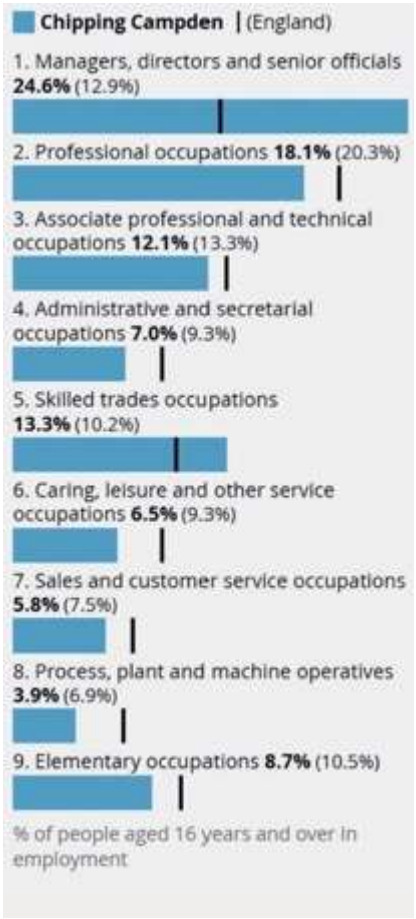
Economic Activity Status



Distance Travelled to Work



Occupation



Socio-Economic Classification (NS-SeC)



Housing completions and type

Since 2012 Chipping Campden Parish has seen substantial housing development: 288 houses have been built, with another 76 in the Local Plan proposed for the Aston Road development (see Local Plan). But very little new social housing has been built for many years, and the older stock of social housing has been significantly reduced through the exercise of right to buy. Over the 1930s and 1950s approximately 200 social houses were provided, with another 20 or so private houses available for low rent. In the present day there are approximately 58 properties available as social housing within the town. This lack needs to be addressed.



The Town Council requested housing completions data from Cotswold District Council for 1 April 2018 to 31 March 2023 (5 years), summarised in **Table 2**. Most dwellings were built on greenfield land - there is not much previously developed land in the parish and that new housing development will probably, of necessity, need to be located on greenfield sites.

Year	Net completions	Dwellings on greenfield land	Dwellings on brownfield land
2018/19	10	23	0
2019/20	24	10	13
2020/21	38	34	4
2021/22	23	10	14
2022/23	23	3	7
Annual Average	18	16	2

Table 2: Residential completions 2018/19 –2022/23
Source: Cotswold District Council

Data in 2023 was recorded differently from the preceding years and for that year (2022/23) it is possible to review house sizes. Almost two thirds of new homes were large and there was a relatively small number of one- and two-bedroom properties. This confirms the census data that shows that many homes have "unoccupied" bedrooms. This is shown in **Figure 7.**

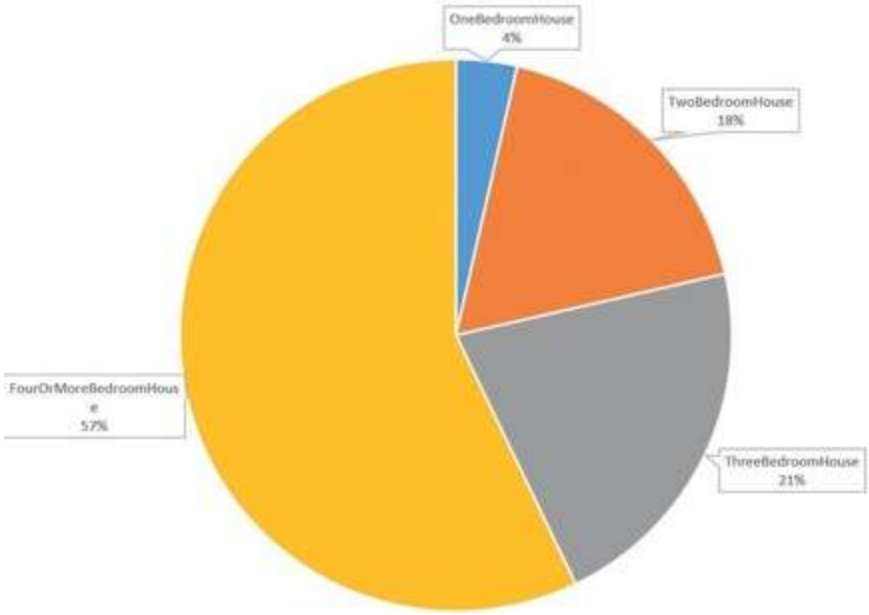


Figure 7: Residential completions in 2022/23 by number of bedrooms
Source: Cotswold District Council










NEW BARRELS PITCH

Community concerns and aspirations







Community concerns

- Details of the consultation with the local community during the CCNDP preparation process which began in 2014, and included meetings, open days and community surveys are contained in the Consultation Report which is a separate document. The CCNDP reflects the results of these consultations. A summary of the key findings of community consultations for the CCNDP and of the approved Local Plan is set out below.

- Because of its international reputation as the 'Jewel in the crown of the Cotswolds', Chipping Campden Parish is an attractive location for people with means to purchase homes, including weekend or second homes. The impact of this has also been felt in surrounding villages and hamlets, with high house prices, disruption of communities and the stifling of economic activity, a fact recognised in Local Plan Policy S16.[3]

- There is a need for affordable and / or social housing for local people, housing suitable for an aging population, and conversion of properties within the town where this would restore listed buildings in line with the Cotswold Design Code but would not result in the loss of retail, hospitality or employment floorspace.

- There is strong opposition to new peripheral housing developments outside the Chipping Campden Development Boundary.

- There is a need to protect the unique townscape and natural environment and setting of the Town and Parish. These should be conserved and enhanced, not spoilt by poorly designed and/or sited developments for inappropriate uses which can affect the Town and the area's attraction to tourists and damage the local economy.

- A Community Design Statement is needed to support the Cotswold Design Code.

[3] Cotswold District Council Local Plan

- Neighbourhood Plan policies should protect land quality and the sensitivity of Chipping Campden Parish's environment and setting, by resisting development on the valley floor of the Cam and the Coneygree to the south of the church and the steep slopes on the north-west edge of the town, the view corridors and vistas to the church; landscape to the south between Chipping Campden and Broad Campden, and the rising ground to the west.

- Plan policies should seek to maintain and develop the Town's economy, protect and develop existing employment sites, create new employment opportunities within the parish, and support and develop tourism.

- The Town is very fortunate to have the range of shops available and residents should 'either use them or lose them'. The weekly and monthly markets prove popular and provide additional retail choice in the town, Most people used the Town for 'top-up' grocery shopping rather than mainstream shopping.

- Additional parking is required (including bus parking), better access to public transport is needed and a reduction in the impact of through traffic is required, especially relating to Heavy Goods Vehicles.

- Residents tend to use their cars for heavier weekly shopping although this means that they do not do their 'weekly shop' in the Town. Comments made about the need to have a car park close to the shopping facilities included – 'Parking diabolical, street blocked all day by office/ shop workers and Cotswold Way walkers, Get A Car Park! Parking is the essence, too many long-term parked vehicles by people walking the Cotswold Way, Whenever planning permission is given, parking provision should be mandatory, opportunities in the past missed'.

- Many leading food retailers offer home delivery services within the Parish.




A.I.M.Logistics
Ltd








Campden BRI
food and drink innovation



















Community aspirations

The Cotswold District Local Plan has offered a number of as yet unrealised opportunities that the community continues to support: these include the opportunity to create better car parking facilities in the town centre alongside the redevelopment of Chipping Campden School and the opening of a new railway station. These matters are strategic in nature and beyond the capacity of a neighbourhood plan to deliver. However, the main opportunities can be summarised as follows and mapped in **Figure 8**. This figure should not be construed as an allocation.

Better town centre parking

It is hoped that eventually, Chipping Campden School will have a new school campus that will offer new car and coach parking opportunities for residents and tourists out of school hours.

It is understood that Chipping Campden School has been working closely with Gloucestershire County Council to develop an overall plan for the delivery of the Bratches Development including the new access road and car park and is in discussion with Gloucestershire County Council with respect to the financing of the road and car park. The school has consulted widely and has received substantial support for the project.

Railway Station

Chipping Campden Town Council supports the reopening of the Cheltenham to Stratford-upon-Avon railway line (Local Plan Policy SP6, INF3), a railway station at Chipping Campden, and the review of HGV routes and traffic management improvements in the CCNDP area.

The re-opening of the Cheltenham to Stratford-upon-Avon railway line is an opportunity to add a new mode of travel to the town.

Improvements to the Honeybourne line, and the inclusion of a railway station at Chipping Campden could allow residents and visitors to travel by more sustainable modes than the current reliance on private cars.

Campden BRI, Campden Business Park and start-up industries

The Town Council supports the master-planning and development of the BRI site, expansion of the Campden Business Park for international and local start-up businesses.

- Ensuring buildings are of a high standard of design to attract high quality industry.
- Encouraging new firms to start up or relocate to Chipping Campden for new laboratories, business space, conference and training facilities and food testing.
- Chipping Campden Library in the town centre provides a local business hub offering 3-D printing, graphic design hardware and other business support.

Chipping Campden Town Council supports the development of a replacement primary School, Health Centre and Indoor Sports Facility on a site adjacent to the Bratches Housing Development off Aston Road.

Replacement Primary School

St James and Ebrington Primary School on Cherry Tree Close is on a cramped site where all the children from the current two sites cannot be all accommodated at once. The children who do attend regularly need to spill out onto the adjacent Recreation Ground for supervised fun and games. Parking and drop-off at school opening and closing times is chaotic on narrow residential streets. A new site for a bigger school with playgrounds and easy access would be welcome, improve school children's outcomes, and relieve congestion in Chipping Campden.

Health Centre

With an increasing population due to extra housing, and with an increasingly ageing residential profile, the current surgery in Back Ends cannot cope with demand and car parking is virtually non-existent. A new larger health centre with parking would overcome these problems.

Indoor Sports Facility

The secondary school has a small indoor swimming pool and gym made available to the Town outside school hours. The Town does not have a general access public indoor leisure facility and relies on the school and whilst these are valuable, the standard of facilities requires improvement. An indoor facility to help keep the townsfolk generally healthier, and to allow expert coaching and practice would be a great asset. A shared car park for these facilities also makes sense.



Figure 8. Community aspirations
Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Plannning Policies



Planning Policy context

The Development Plan[4] for Chipping Campden is the Cotswold District Local Plan 2011 – 2031, adopted August 2018. Notable policies are:

- Policy DS1 identifies Chipping Campden as a Principal Settlement.
- Policy DS2 allows development within Development Boundaries.
- Policy CHI3 allocates land for a car park which has since that allocation has proven to be undeliverable.
- Policy S16 (Chipping Campden)
  - Allocates land at Aston Road for 36 dwellings (this has been delivered through planning permission 18/04768/ OUT granted in 2020).
  - Allocates land for a burial ground that has also proven to be undeliverable.
  - An extension to the Campden Business Park.
  - Identifies the need to safeguard the railway station site to accommodate requirements in the Local Transport Plan for a new station.
  - A new pocket park is allocated.
- Policy EC4 (which is predominantly outside the neighbourhood area) contains policies for the Campden BRI.
- Policy EC7 identifies the Key Centre Boundary.
- Policy SA3 in relation to INF1 identified the strategic infrastructure requirement for the expansion of Chipping Campden Secondary School.

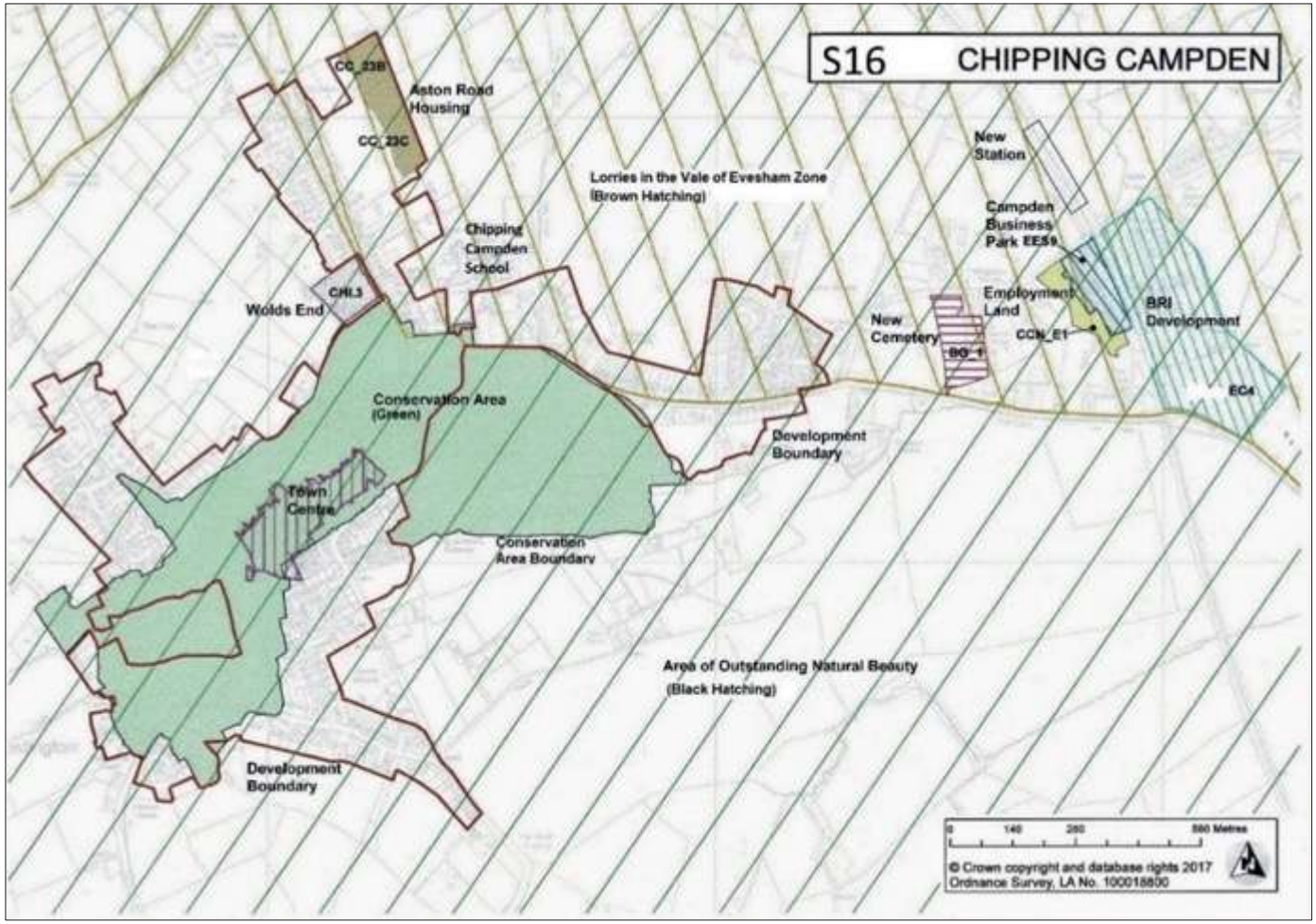
[4] Waste and minerals plans produced by Gloucestershire County Council are not



Cotswold District Council Local Plan

The local plan is being updated and where policies change substantially, this may render some of the CCNDP policies out of date.

The Cotswold District Local Plan contains many policies to support the Local Plan's Development Strategy. These are not repeated in the CCNDP and any reading of the CCNDP should be accompanied by a study of the District Local Plan so that the full implications of both plans are understood.



Sustainable development

The NPPF requires plans to be based upon the presumption in favour of sustainable development to meet the development need of their area, align growth and infrastructure, improve the environment, and mitigate climate change. Sustainable development is defined as having economic, social and environmental objectives.

The CCNDP has set out policies to meet the requirement for sustainable development and this is illustrated in **Table 4**.

CCNDP policy	Economic Objective	Social Objective	Environmental Objective
1: Chipping Campden Town Centre			
2: Social and community infrastructure			
3: Design of the built and natural environment			
4: Non-designated heritage assets			
5: Biodiversity net gain and local nature recovery			
6: Local Green Spaces			

Table 4: How the CCNDP promotes sustainable development objectives









Policy 1: Chipping Campden Town Centre

Objectives

- **to protect and develop the town's economy**
- **to strengthen the vitality and viability of the town centre by protecting and enhancing the range of retail, hospitality and other commercial offerings**
- **to improve the town's tourism offer and its attraction to tourists and visitors by improving existing facilities and introducing new ones.**
- **To ensure that there is an appropriate balance between rental accommodation for tourists and that which meets the needs of residents and their families**
- **To improve facilities for car parking**
- **To improve the facilities and safety for cyclists and pedestrians**

Chipping Campden town centre is a key attraction for tourists to the town and the surrounding area. It also provides for the day-to-day needs of residents because there is no major supermarket in the parish. Residents must drive to Evesham and Stratford-upon-Avon for their main shopping.

The town centre, because of its beauty and historic integrity, is very popular for visitors and attracts a mix of day visitors, people who stay in local hotels and B and Bs (including AirBnB) and for those who are passing through as walkers on the Cotswold Way which starts in Chipping Campden High Street.

The visitor economy is crucial to the well-being of permanent residents because their trade keeps small local businesses open and boosts the local economy to provide for more eateries, pubs and cafes than would normally be possible in such a small settlement. Providing for and supporting tourism is critical to the continued success of Chipping Campden town centre.

Tourism brings negative impacts as well and these must be managed. Overnight visitors are better-located in the town centre where they can walk to shops and hostelries; and existing shops, which create the vibrant and enjoyable town centre experience and create its character, should be protected.

The town centre is also an important employment location as the provider of a range of professional and other services required by residents and other local businesses.

Although the scope for housing may be limited, the town centre could be a good location for the elderly or those people who work there and cannot afford to travel. There can often be opportunities for housing conversion in the upper floors of commercial premises.


campden
gallery

Town Centre land uses

Local Plan Policy EC7 (Retail) identifies Chipping Campden as a key centre.

Policy EC8 (Town centre uses) states that the preferred sequence of locations for main town centre uses are in the centre only for key centres, and out of centre locations will only be considered if there are no suitable town centre locations. Policy EC8 goes on to require that all town centre uses should help maintain an appropriate mix of use in the centre and contribute to the quality, attractiveness and character of the settlement and the street frontage within which the site is located. The policy goes on to state that within the centre boundaries, town centre uses will be permitted where they would complement and enhance the retailing offer and that loss of town centre uses will be resisted.

Where the loss of a main town centre use is proposed, evidence must be submitted to demonstrate that the property has been continually, actively and effectively marketed for at least 12 months and that the use is no longer of commercial interest. Upper floor conversion in the town centre for housing will be permitted.

The CCNDP working party mapped all the main town centre uses in Chipping Campden for the area within and immediately adjacent to the key centre boundary (EC7) for ground and upper floors. This map is very detailed and has been repeated in **Appendix 3** in a smaller scale so that individual properties can be identified. **Figure 9**, below, shows the key centre boundary and the individual properties with their land uses.

Figure 9 shows that in October 2023, there was a good mix of town centre land uses although residential use clearly dominates[5]. As will be shown below, many of these residential properties also function as visitor accommodation according to evidence on the AirBnB website[6].

It is likely that visitor trade is responsible for the good mix of retail and food and drink establishments in the town centre – there is clearly a positive inter-relationship between town centre uses and the tourism industry. Other north Cotswold settlements that are a similar size as Chipping Campden, such as Mickleton and Northleach, do not boast as many shops and eateries though Stow has a thriving town centre.

As intended by Local Plan Policy EC8, the mix of town centre uses defines the character of the high street and to a greater extent the Conservation Area it sits within. No clear data on town centre land uses in Chipping Campden was available until this CCNDP mapped them. The data in **Figure 9** and **Appendix 3** should be considered the baseline for Local Plan policy EC8 as the basis of future planning decision-making with regard to EC8 (4) (b). The data shows the town centre land uses in 2023 and can be used to monitor change in land use over time.

[5] Sui Generis denotes activities that don't have a standard land use and therefore must always require planning permission to change use.

[6] Holiday Homes & Apartment Rentals - Airbnb, November 2023.



Figure 9: Town Centre Land Uses in Chipping Campden Key Centre
Source: Street survey October 2023, map by Andrea Pellegram Ltd, under OS licence AC0000808712

Changes to key centre boundary

Chipping Campden High Street runs in a south-westerly direction from its junction with Church Street to the east and Leysbourne to the north-east – the High Street runs on to become Leysbourne, and where they meet a T-junction is formed with Church Street.

The current key centre boundary line cuts across the High Street just a few metres short of its junction with Leysbourne and Church Street. CCTC believes this is not consistent with key centre main uses and functionality. On the northern side of the street, just 3 more properties lie between the existing boundary (which cuts through The Malt House): The Old School House, Grevel's House and Ivy House. The road sign for the High Street is situated at the front of Ivy House as shown in **Figure 10**.

Grevel House is Grade I listed, and is the oldest building in Chipping Campden, much photographed by tourists **Figure 12**. On the opposite side of the street, at the commencement of the High Street where it forms the junction with Church Street, is Chipping Campden Pharmacy, which is perhaps the most important facility on the High Street, serving the whole community and surrounding area with medicines, other pharmaceutical products, and services such as blood pressure testing.

The existing key centre boundary relating to Local Plan policy EC7 will be modified to better reflect the real function of the high street, as reflected in the geometry of the junctions and the existence of a key town centre use that is currently outside control of Policy EC8, but should be included within, given its importance to the community. The revised boundary is shown in **Figure 13.**



Figure 10: Commencement of High Street at Ivy House, three properties away from existing boundary.



Figure 11: Opposite Ivy House, junction with Church Street, and commencement of High Street, with Chipping Campden Pharmacy.



Figure 12: Grevel House; 14th Century, Grade I listed.

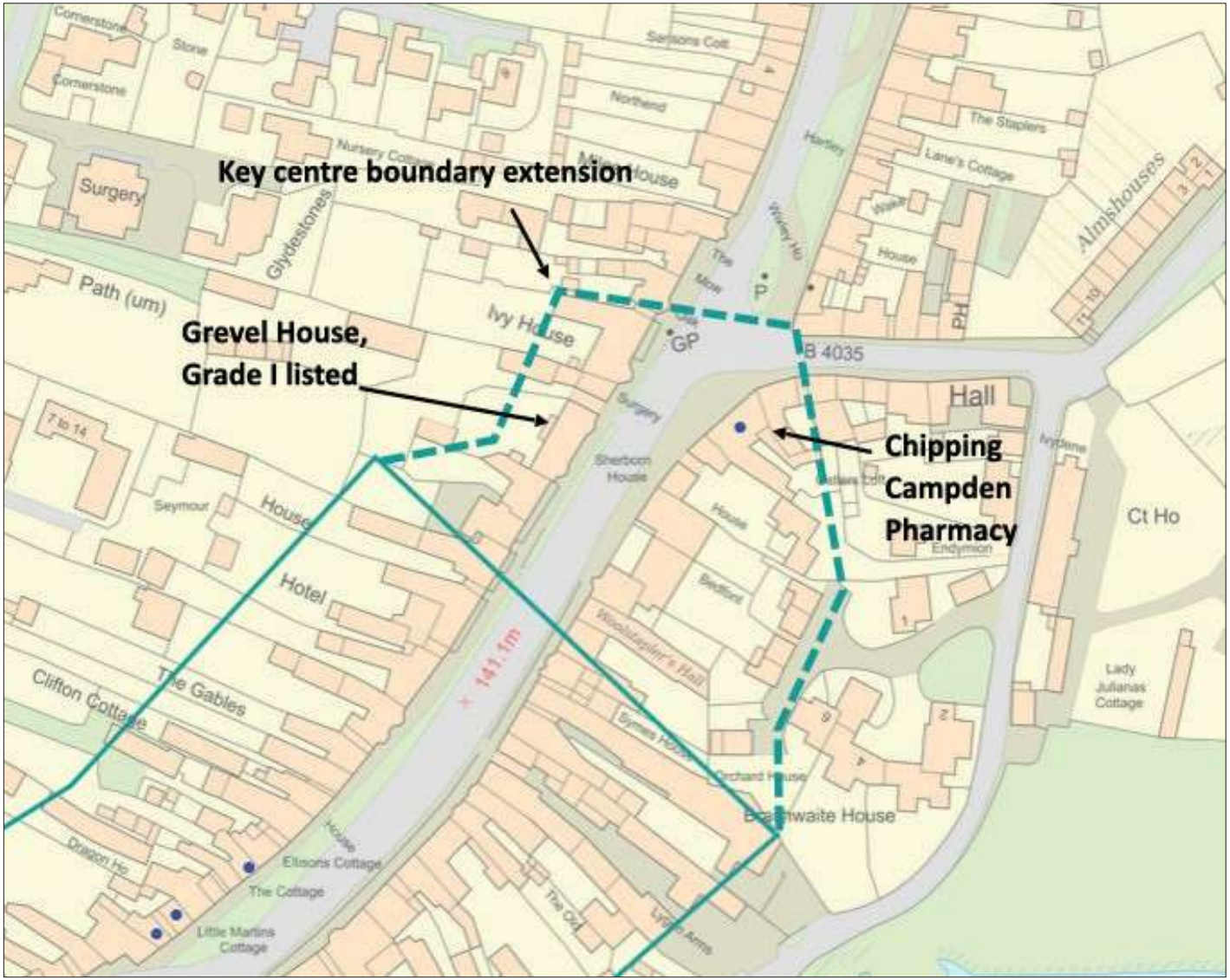


Figure 13: Revised Key Centre Boundary (Local Plan Policy EC7)

Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Visitor accommodation

As already mentioned, Chipping Campden is the "jewel of the Cotswolds", an ancient wool town, centre of the Arts and Crafts Movement, an exquisite wedding location, hosting a world-class music festival, location for Court Barn museum, start of the iconic Cotswold Way long distance footpath, near some of the National Trust's best sites such as Hidcote Manor Garden and is located in the world-renowned Cotswold National Lanscape.

Chipping Campden is a visitor attraction in itself: an immaculate and perfect example of the Cotswold design vernacular where the local Cotswold Stone is evident throughout its extremely well-preserved historic environment and rural setting.

Tourism is a key part of the local economy as a result, providing footfall for local businesses and maintaining the vitality of the high street. **Figure 14** shows a snapshot of the number of AirBnB accommodation addresses listed in November 2023 as a snapshot, though the number of units will probably change over time. **Figure 14** shows (in blue) that there are 3 hotels in Chipping Campden that also provide restaurant and pub spaces.

Local Plan Policy EC10 takes a positive approach towards the creation of new tourism facilities and visitor attractions that have a relationship with the historic and natural heritage of the area. Policy EC11, as it would be applied in the neighbourhood area, would allow for new hotels and serviced accommodation through the change of use of existing buildings within the Chipping Campden development boundary. Likewise, that policy requires that the creation of self-catering accommodation should also be provided in existing buildings and within the development boundaries.

This policy has implications for the Chipping Campden town centre because existing residential units can be converted without planning permission (in most cases) into holiday accommodation such as that advertised on the AirBnB site. At present, there is no separate use class for this sort of visitor accommodation and as such, these changes from residential to visitor accommodation are outside planning control. However, it is understood that the Government may introduce a new use class for short term holiday lets and if this is done, it may be possible to exert greater control over this form of development in Chipping Campden.

Under current rules, planning permission or listed building consent may be required where the existing buildings need to be altered to make the change from residential to visitor accommodation. Many of the buildings in Chipping Campden are listed and where this is the case, consent is normally required for:

- demolition - in whole or in part.
- any works of alteration or extension which would affect its character as a building special architectural or historic interest.
- any repair work that could affect the historic character of the building.
- replacement of historic features, fittings or fabric. It is a common misconception that only the exterior of a building is protected. Listed Building protections can extend to both the interior and exterior of the property. Protection can also extend to the curtilage of a listed buildings or structure.

Clearly, short term holiday let accommodation generates tourist visitors who are customers which help to keep Chipping Campden high street businesses alive. If the change from residential to visitor accommodation goes too far, it could become a threat to the vitality of the high street. Seasonality of tourism visits to the area is a key consideration and there is a balance that needs to be struck between retaining local residents who shop all year round, and visitors who may only visit the high street seasonally, thus leaving local shops vulnerable during off-peak tourist season.

Until there is planning control to regulate changes from residential uses to AirBnB type uses, planning control is limited to change under listed building consents and perhaps the change of use of shops to tourism accommodation which falls under Local Plan Policy EC8.

Chipping Campden town centre is currently functioning well and the current levels of footfall from both permanent residents and visitors is sufficient to maintain this vibrant town centre. The creation of new non-serviced short-term holiday let visitor accommodation from existing residential accommodation in the town centre could result in loss of retail and service activity, particularly in low tourist season.

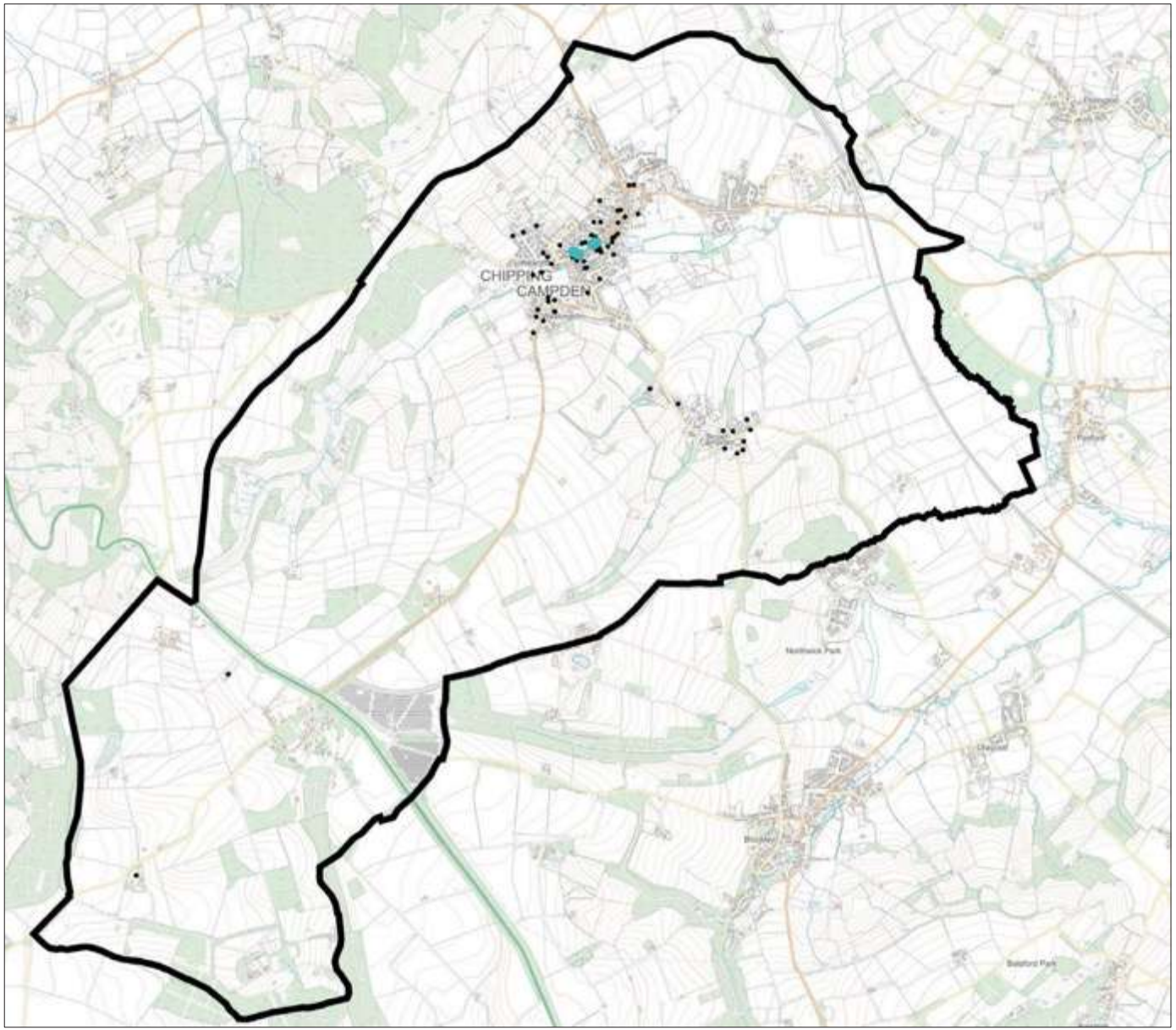


Figure 14: AirBnB accommodation and hotels in Chipping Campden Parish (November 2023)

Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Town centre parking

Community discussions around the Vision and Objectives identified that local residents were concerned that there was insufficient parking in the town centre and elsewhere in the two main settlements. The result is cars searching for spaces causing congestion, vibration and pollution in the town centre.

The Town Council undertook a parking survey in November 2023. A survey form was sent to all households inside the *Campden Bulletin* and 167 forms were returned. **Table 5** shows the results of the survey in order of support with the highest average score indicating greatest support.

The most popular options were time-limited parking and parking provided at the school. Other popular suggestions (38 respondents) were for parking at Cutt's Yard in the town centre. None of these suggestions can be progressed through the neighbourhood plan as policies but they can be progressed by the Town Council in response to planning applications and proposed policies from Gloucestershire County Council as the Highways Authority.

The Highways Authority, publishes data on road casualties. The 2019-21 data shows that for the parish as a whole, there were two fatalities in that year, 3 serious accidents, and 9 slight accidents. These figures (except for casualties) should be considered as under-reported since not all accidents are logged into the Gloucestershire database.

Local Plan policy S16 allocates land at Wold's End Orchard as a car and coach park. However, this site has been withdrawn since the site has been acquired by the Campden Society and maintained as a working orchard.

Initial discussions are progressing on a proposal to construct a new Chipping Campden School car and coach park on a site within the School campus to the north of Chipping Campden School. The car park would be accessed by a road integrated with the 'Bratches' housing development, on land in the ownership of Gloucestershire County Council; partly on the existing access road to Wolds End Farm, which would be upgraded; with the final section of the road being within the School Campus.

At present, the site proposed for the car park is a rough grassed area, bordered by the Wolds End Farm boundary, the Heart of England Way and Monarch's Way long distance footpaths, the School's Astroturf football / hockey pitch and the school playing field.

Chipping Campden is expanding, with 348 extra houses recently constructed or awaiting planning permission, putting significant strain on the Town's road and parking infrastructure. For some time, Chipping Campden has required a new public car park for coaches and cars particularly for visitors and local workers.

The creation of a new car park for the School would allow the existing School car park to be used for public parking providing approximately 100 additional public parking spaces within safe walking distance of the Town Centre. This will help meet the growing demand for parking from visitors to Chipping Campden and improve road safety standards, while alleviating congestion and reducing pollution to help improve the health and wellbeing of school children and residents.

The existing Chipping Campden School car park has capacity for around 100 cars, but the School anticipates an increase in students over the next five years which will lead to an increase in the demand f or car and coach parking. At present, access is via Cidermill Lane, a one-way narrow gyratory system, which serves roads to the north, south and east of Chipping Campden. Throughout term time, sixteen coaches transport students to and from the School – between 8-9am and 2.30-4pm – at the beginning and end of each school day.

During the school day, the existing car park is available for parking by staff, students, and school visitors, however, the central area of the car park requires to be vacated twice a day when coach movements take place. Random parking of cars, camper vans and coaches, when combined with the arrival and departure of School student coaches causes severe congestion.

The Town Council undertook a parking survey in November 2023. A survey form was sent to all households inside the *Campden Bulletin* and 167 forms were returned. **Table 5** shows the results of the survey in order of support with the highest average score indicating greatest support.

Table 5: November 2023 Parking Survey Priorities

Source: Chipping Campden Town Council, November 2023

Respondents scored various proposals, with 1 being opposed and 10 being fully supportive. The averages where:	Average score
Provide new school car park and free up existing school car park for all to use (usual fees)	6.8
School car park freed-up, with reduced parking fees for all town residents and employees	6.5
Time-limited, with permits for long-term parking for residents lacking off-street parking	6
Time-limited parking, but permits for town-centre residents to park long-term	5
School car park freed-up, with reduced parking fees for town employees only	5
New public car park off Aston Road	4.6
Paid permit parking for residents of town centre with no time-restriction	3.6
New public car park on Back Ends	3.6
New public car park on Station Road next to sewage works	3.4
No change to current situation	3.3
Time-limited (eg 2-hours) parking on street for all	3.2
Paid permit parking for all Campden residents with no time-restriction	3
Pedestrianise the town centre	2
Ban on all on-street parking in the town centre (as defined in survey form)	1.7

Policy 1: Chipping Campden Town Centre

The information in Appendix 3 in this plan should be the baseline for Local Plan Policy EC8, and there will be a presumption that town centre uses (Class E, Sui Generis and all forms of visitor accommodation) will be retained.

The Key Centre Boundary is extended as shown in Figure 13.

Where planning control can be exerted, the change from residential and town centre uses to visitor accommodation will only be allowed where it can be demonstrated that there will be no harm to the vibrancy of the town centre.

Proposals to provide extra parking at Chipping Campden School or elsewhere to alleviate congestion in the town centre will be supported.

Policy 2: Community facilities and infrastructure

Objective

- **To ensure that the community has appropriate infrastructure in terms of health services, sports / leisure facilities, amenities, public transport and green infrastructure**

Chipping Campden is fortunate to have a full range of community facilities, local health services, opportunities to meet, high quality recreation for all ages, and beautiful and tranquil open spaces within the built up areas. This is in addition to the beautiful countryside in the Cotswolds National Lanscapes and the many recreational opportunities that it provides.

It is important to take stock of what is available and to ensure that provision is maintained in the long term so that this high level of quality services is maintained for future generations.

Local Plan policy INF2 defines social and community infrastructure as being:

- doctors' surgeries and dental practices, day-care centres, hospitals and other healthcare/social service facilities;
- community safety and emergency services (fire, police, ambulance: the "blue light" services);
- education and training facilities (including adult and further education), pre-school centres and other children's services community halls/hubs, including places of worship and youth provision;
- cultural facilities, such as arts centres, libraries and museums;
- waste management, collection, recycling and disposal services;
- local shops, meeting places, and public houses;
- sports facilities and open space of public or nature conservation value; and
- parks, gardens, allotments and amenity open space together with natural or semi-natural green spaces such as disused canals or railway lines.

Table 6 and **Appendix 4** list all the social and community infrastructure in Chipping Campden Parish as the baseline of what exists and that should be protected under Local Plan policy INF2. Some infrastructure shown in the table such as defibrillators and the specific activities that are carried out inside commercial sites do not require planning permission to change use and so it will be important to maintain an overview of the current provision in these cases.

Table 6: Social and community infrastructure in Chipping Campden Parish

Allotments
- Chipping Campden Allotments - F2

Care Homes
- Mill House Care Home - C2
- Jecca's House / Campden Home Nursing - C2

Churches
- St James Church - F1f
- Chipping Campden Baptist Church - F1f
- St Catherine's Church - F1f
- St Michael and All Angels Church - F1f
- Friends (Quaker) Meeting House - F1f

Defibrillators
- Berrington Road telephone kiosk
- Broad Campden telephone kiosk
- Leisure Centre
- Chipping Campden Pharmacy
- Post Office
- St Catharine's School

Dentists
Today's Dental Care - Ee
Ashbee Dental Care - Ee

Doctors' Surgeries
- Chipping Campden Surgery - Ee

Gardens and parks
- Ernest Wilson Gardens - F2c
- Wolds End Orchard - F2c

Fire Stations
- Fire Station

Meeting Rooms / Facilities
- Church Rooms - F2c
- Town Hall - F2c
- Old Police Station – Courtroom - F2c
- Broad Campden Village Hall - F2c
- Baden Powell Centre - F2c

Opticians
- Dr C.P. Grey - Ee

Play areas
- Recreation Ground Play Area (George Lane) - F2
- Castle Gardens Play Area - F2
- Recreation Ground Play Area (Olimpick Drive) - F2

Post Offices
- Post Office - F2a

Public Houses
- The Eight Bells
- The Lygon Arms Hotel
- The Noel Arms Hotel
- The Red Lion
- The Volunteer Inn
- The Bakers Arms
- Cotswold House Hotel

Schools
- Chipping Campden School - F1a
- St James and Ebrington C of E Primary School - F1a
- St Catharine's Catholic Primary School - F1a

Shops (Groceries)
- The Co-operative (Co-op) - Ea
- Fillet & Bone - Ea
- The One Stop Shop – Ea
- Toke's – Ea
- Maylams - Ea

Spas
Cotswold House Spa Ed

Sports Facilities
- Recreation Ground - F2c
- Chipping Campden Bowling Club - F2c
- Chipping Campden Cricket Club - F2c
- Chipping Campden Tennis Club - F2c
- Chipping Campden Leisure Centre - F2c

Toilets
- Sheep Street Public Convenience - F2
- Old Police Station - F2

Theatres, museums and library
- Court Barn Museum - F1c
- Cidermill Theatre
- The Old Silk Mill - F1c
- Chipping Campden Library - F1d
- Visitor information centre - F2a






Mickleton HS
PRONTO
YN08 SOH



Nationally permitted development and use classes

National legislation[7] allows for the change of shops (Use Class E) to dwellings (Use Class C3) under most circumstances (referred to as Class MA development). This means that it is easy for landowners to convert town centre uses such as shops into dwellings. This does not apply to the Chipping Campden town centre because of the policy does not apply where the proposed building to change use:

- has floorspace that exceeds 1,500 sq. m.
- is a listed building
- is in a conservation area
- is within a National Landscape (formally referred to as AONB).

All these exemptions apply in Chipping Campden Key centre and therefore there is no nationally permitted change of use from shops to residential.

Planning permission will be required for these conversions and then Local Plan Policy INF2 and EC8 will apply.

Some shops are not considered to be Use Class E but are Use Class F2 (local community) where they are smaller than 280 metres square and there is no other such facility within 1000 metres radius of the shop's location. This is limited to shops that sell 'essential goods, including food, to visiting members of the public'.

The criteria set out above relates to shops selling 'essential goods' which include food but are not limited to food. In Chipping Campden, the post office also serves essential purposes in selling a range of household products, some foods, operating as a post office and additionally as a bank. It can therefore be considered to be Use Class F2a because if it were to close, the community would lose an essential service which sells a range of daily products and services and where there is no alternative within 1000 metres.

Similarly, at present, there are three small shops that would be defined as Use Class F2a, if they were the last shop standing. This means that it might be possible for two shops to close but the third and remaining shop should be retained.

Other services, such as the optician and dentist, are Use Class E but it could be argued that they important community facilities. However, these businesses rely upon the willing trading of individual trained professionals who may, out of personal choice, cease trading. There is that the planning system can do when the occupants of commercial premises vacate.

Other essential infrastructure

Some other infrastructure is essential to life in Chipping Campden but is not referred to in Local Plan policy INF2. This includes defibrillators and care homes. Defibrillators provide an essential safety feature in the case of an emergency. These are listed in **Table 6** and should be retained.

There is a care home at Mill House that provides residential accommodation and care for older people who can no longer live independently. This is a valued component of local community infrastructure. Additionally, there are two assisted living developments at Badgers Croft and Saxon Grange. Finally, there is a home care service charity (Campden Home Nursing) providing end of life nursing care to people in their homes.

Burial plots

A recent survey (March 2024) commissioned by CCTC confirmed that there were a potential additional 44 burial plots remaining. Land allocated in the Local Plan for burial space is no longer available. New burial land is therefore required and will become urgent in time. The Town Council has not identified potential sites. All sites require the approval of the Environment Agency regarding pollution impacts to groundwater. Burial sites should be accessible to all members of the community on foot, cycle or car, and

[7] The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2023 (legislation.gov.uk) The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (legislation.gov.uk)

should accommodate the needs of all faith groups.



Policy 2:
Social and community infrastructure

The infrastructure identified in Table 6 and Appendix 4 should be used as the basis of Local Plan Policy INF2 and EC8.

The provision of suitable land for human burial will be supported.

Policy 3 Design

Objective

- **To protect and enhance the area's heritage assets and its location within the Cotswold National Landscape, by encouraging development and conservation projects focuses that are sympathetic to the scale, design, heritage, and character of Chipping Campden Parish and its beautiful landscape setting and resisting developments for inappropriate uses, or that are unsympathetic to the scale, design, heritage and character of the town and its landscape setting.**

The Cotswold Local Plan provides very strong control over building design for the district in general and further advice is available from the Cotswolds National Landscape Management Plan.

The Cotswold Local Plan provides very strong control over building design for the district in general and further advice is available from the Cotswolds National Landscape Management Plan[8]. However, neither of these important documents are specific to Chipping Campden or Broad Campden and for this reason, the Town Council secured free technical support to prepare The Chipping Campden Design Guide. This can be found as a supporting document to the CCNDP. The Design Guide provides general advice for applicants and should be consulted in the development of designs.

In addition to the design of the built environment, Building With Nature[9] provides standards for green infrastructure and even offers accreditation for meeting those standards. Given the exceptional

quality of Chipping Campden Parish's environment, Building With Nature will ensure that new development makes the best contribution possible to improving the natural environment.

The historic environment is equally important in defining Chipping Campden Parish's unique identity and this is discussed further in Policy 4 for non-designated heritage assets. The historic environment is protected through Conservation Area status, listed building designations and Scheduled Monument protections, all of which are discussed elsewhere in the CCNDP.

The Historic Environment Record can also be consulted to reveal other assets and can be accessed by email at *her@gloucestershire.co.uk*

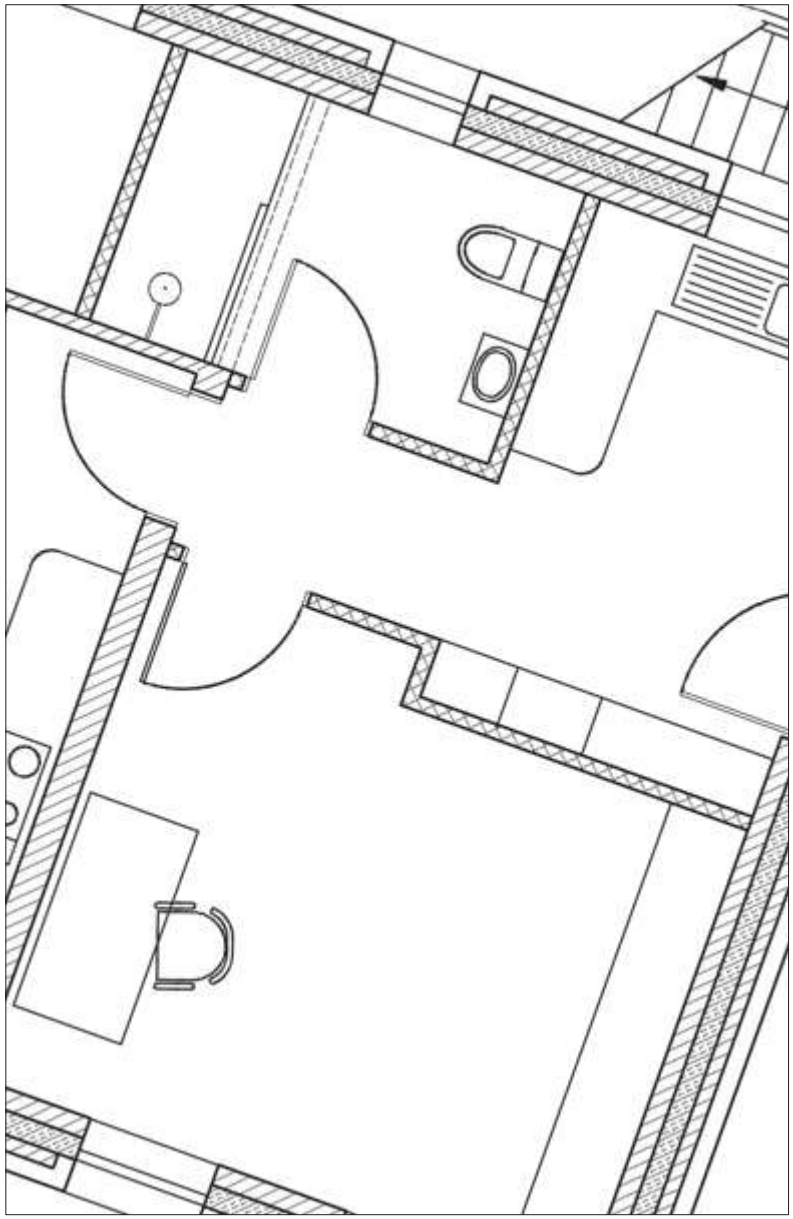
[8] https://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/

[9] https://www.buildingwithnature.org.uk/













Policy 3:
Design of the built and natural environment

Planning proposals, particularly those with Design and Access Statements, should demonstrate that they have paid regard to the Chipping Campden Design Guide and should be designed according to the Building with Nature Standards Framework or equivalent.

Policy 4: Non-designated heritage assets

Objective

- **To protect and enhance the area's heritage assets and its location within the Cotswold National Landscape, by encouraging development and conservation projects focuses that are sympathetic to the scale, design, heritage, and character of**

Chipping Campden Parish and its beautiful landscape setting and resisting developments for inappropriate uses, or that are unsympathetic to the scale, design, heritage and character of the town and its landscape setting

Local Plan policy EN12 manages development affecting non-designated heritage assets and where possible, seeks to enhance the character of the non-designated asset whilst avoiding its demolition or total loss subject to a balanced assessment of its significance. Table 6 of the Local Plan sets out the criteria for deciding whether a building, site or structure should be considered to be a non-designated heritage asset.

As set out earlier in this CCNDP, Chipping Campden Parish has two conservation areas and numerous listed buildings. These designations afford a tremendous level of protection for the historic environment and the CCNDP cannot, and should not, attempt to subvert these protections.

However, sometimes the small and overlooked historical features add a charm and character that formal listing may not protect. Examples of these sorts of features are signs, pumps, boot scrapers, sundials, post boxes and other small but significant features that add to Chipping Campden Parish's unique character. These small and sometimes humble features are worth preserving and are identified for preservation under Local Plan Policy EN12.

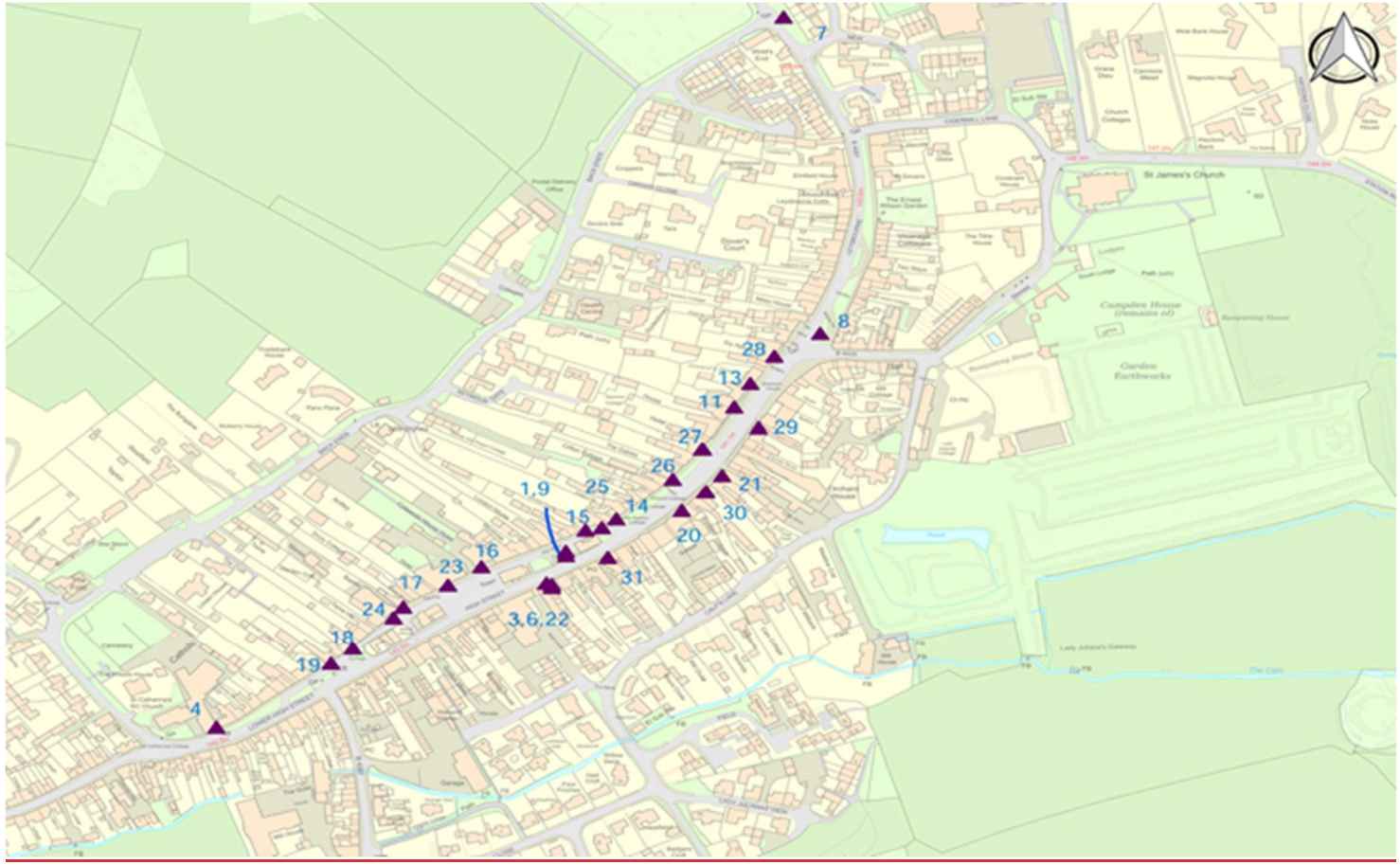
The main criteria that have been used to select these features derive from Local Plan Table 6, Buildings and structures, namely:

- Historic interest
- Age
- Rarity
- Aesthetic merits
- Representativeness of Chipping Campden Parish
- Historic association
- How they contribute to "group value"
  - Known architect / designer / builder
  - Social or communal value.

Appendix 5 gives detail of all the non-designated heritage assets in Chipping Campden Parish, provides their address, and explains their local significance. Some of the important features of buildings are already protected under existing legislation, national and local planning policy. Features of listed buildings are generally protected. However, there is no way to monitor the smaller features such as sundials and boot scrapers and they are therefore listed in Policy 4 so that decision-makers are aware of their existence.

Figure 15 shows the location of the town centre assets. The numbering on the figure corresponds to the asset number in **Appendix 5** and **Policy 4**.

Figure 15: Non-designated heritage assets



Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Policy 4:
Non-designated heritage assets

The following features are designated as non-designated heritage assets:

- **NDHA 1 The Millenium Sign**
- **NDHA 2 Westington Streetlamp**
- **NDHA 3 High Street Stamp Box**
- **NDHA 4 St Catharine's postbox**
- **NDHA 5 Westington postbox**
- **NDHA 6 High Street postbox**
- **NDHA 7 Scuttlebrook**
- **NDHA 8 Town Pump**
- **NDHA 9 Cotswold Way marker**
- **NDHA 10 Broad Campden Post Box**
- **NDHA 11 Punk stone carving**
- **NDHA 12 Graham Greene plaque**
- **NDHA 13 Sundial Grevel's House**
- **NDHA 14 Sundial Dragon House/Cottage 1690**
- **NDHA 15 Sundial Sundial House**
- **NDHA 16 Sundial Cotswold House Hotel**
- **NDHA 17 Sundial Dial House**
- **NDHA 18 Sundial Green Dragons**
- **NDHA 19 Sundial Crosby House**
- **NDHA 20 Sign of the Swan Inn**
- **NDHA 21 Sign of the Lygon Arms**
- **NDHA 22 Sign outside Elsley House**
- **NDHA 23 Bootscraper King's Hotel**
- **NDHA 24 Bootscraper Baptist Church**
- **NDHA 25 Bootscraper The Martins**
- **NDHA 26 Bootscraper Trinder House**
- **NDHA 27 Bootscraper Westcote House**
- **NDHA 28 Bootscraper Ivy House**
- **NDHA 29 Bootscraper Woolstapler Hall**
- **NDHA 30 Bootscraper Dovers House**
- **NDHA 31 Bootscraper Bantam Tearooms**

Policy 5: Environment and Biodiversity Net Gain

Objectives

- **To conserve and enhance the natural setting that characterises the town**
- **To provide and / or maintain green corridors for wildlife across and around Chipping Campden Parish**
- **To meet the challenge of climate change, flooding and light pollution**

Cotswold Local Plan Policy EN8 requires development to conserve and enhance biodiversity providing net gains where possible. Proposals that reverse habitat fragmentation and promote creation, restoration and beneficial management of ecological networks, habitats and features will be permitted, particularly in areas subject to landscape-scale biodiversity initiatives. Developer contributions may be sought in this regard.

CCNDP Policy 5 supports local plan policies and local implementation of requirements under the Environment Act 2021. Under the Act, Biodiversity Net Gain regulations set out requirements for at least 10% biodiversity net gain from most developments.

The CCNDP used supporting evidence obtained from the Gloucestershire Environmental Records Centre to map habitats (see **Appendix 2**). The working party identified areas of the parish which appear to be optimum locations for achieving nature recovery and improvement (**see Figure 16 and Appendix 6**). The following types of opportunity are available in the Parish:

- Waterways (the River Cam and smaller streams and drains) which form valuable riparian habitats
- Orchards and remnants of traditional orchards
- Woodlands and hedges of all types
- Key wildlife sites identified by Gloucestershire Wildlife Trust
- Other linear natural features that function as wildlife corridors.

Gloucestershire County Council (GCC) is working with Gloucestershire Wildlife Trust (GWT) to prepare a Local Nature Recovery Strategy (LNRS) for Gloucestershire which will include Chipping Campden Parish. As the responsible authority, GCC is required to work collaboratively with other local organisations including parish councils with input encouraged from across the public, private and voluntary sectors to establish shared proposals for what action should be taken and where. The LNRS will be published in 2025.

The CCNDP identifies areas which could be optimum locations within the parish to deliver nature recovery and improvement, because either they are already important for biodiversity in their own right, provide ecological connectivity or have good potential to increase in biodiversity value or connectivity. These are based on data provided by the Gloucestershire Environmental Records Centre. It is acknowledged that the report (published in 2017) relies on data from that time and more recent data will be available, but it is considered to remain a realistic and credible representation of nature recovery and improvement potential in the area.

Local areas where nature can be enhanced

Based on this work, the areas where nature has greater chance of improvement in Chipping Campden Parish are identified in **Figure 16** and **Appendix 6.** The appendix provides detailed habitat maps describing the local baseline which is being put forward for inclusion in the Gloucestershire LNRS. This should be referred to by landowners and scheme proposers when devising schemes. This local evidence should be used alongside the LNRS when that is issued. The maps show areas of particular importance for biodiversity, either because of their existing designations, they are locally important or have potential for improvement.





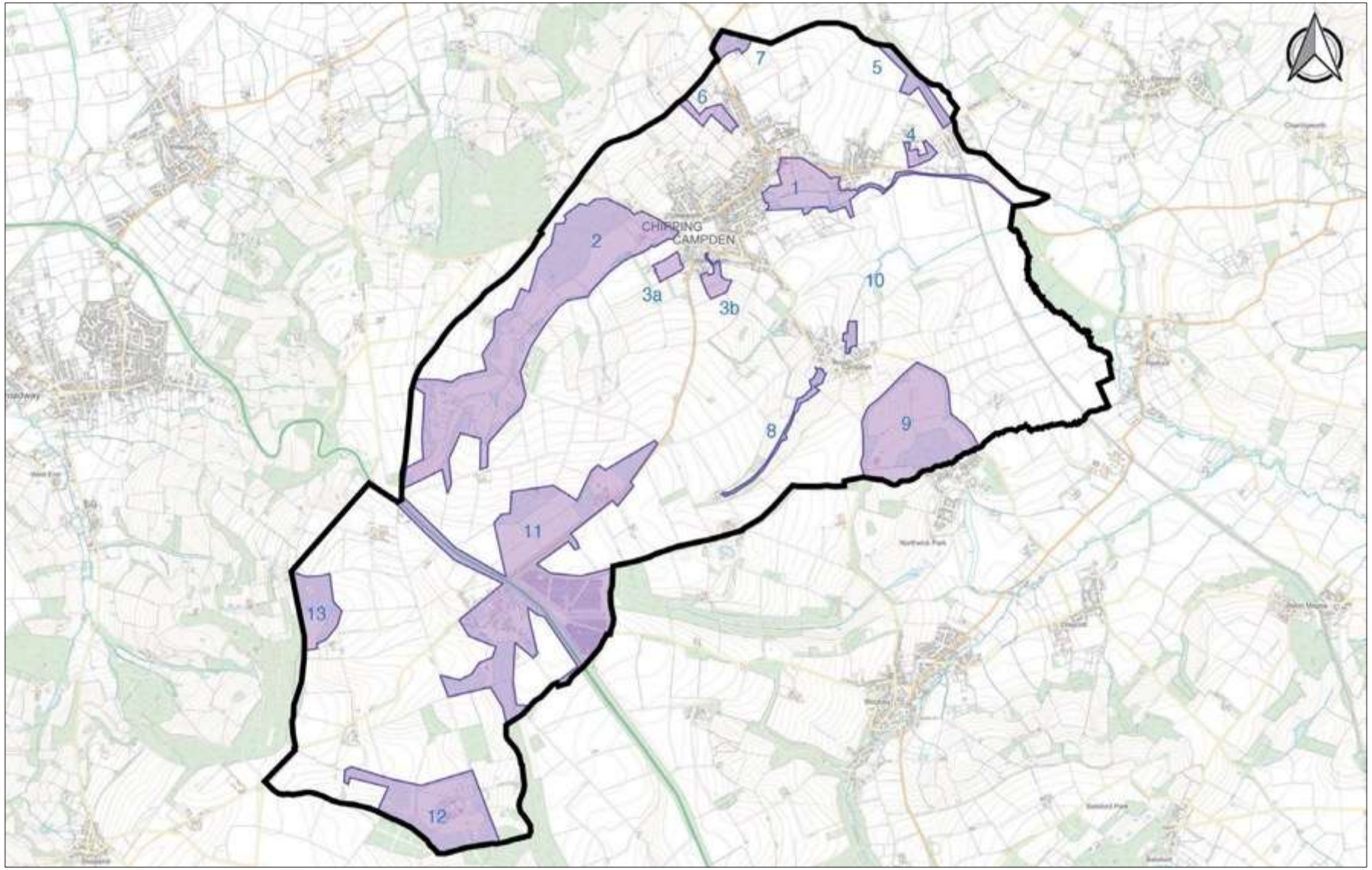


Figure 16: Nature improvement priority areas
Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Opportunities and priorities for improving biodiversity

Whilst it is hoped that the Gloucestershire LNRS will include locations for local nature recovery and improvement within Chipping Campden Parish, the locations identified in Figure 16 may indicate the most ecologically meaningful local opportunities to deliver off-site bio-diversity net gain in relation to developments in the Parish which cannot meet their requirements on-site. Table 7 indicates how biodiversity gain and habitat improvement could be achieved in each of the locations identified in **Figure 16**.

Ultimately, it is up to landowners to decide whether they want to make their land available for nature recovery and improvement initiative or to support local biodiversity net gain associated with local developments.

Additional opportunities arise with individual developments where it may be possible as part of scheme design to improve nature on site or use natural processes to manage water run off or link habitats. Preserving what is already in place, for instance open ditches should not be covered. Natural England's green infrastructure design guide will also help create nature friendly design.

Where possible, light pollution should be minimised.

It is important to note that identification as a local nature recovery or improvement area does not preclude development. Existing land use policies will remain in place. What will change however is that the identified sites are highlighted as being of particular importance with highest opportunities for nature recovery and improvement. It is expected that as the Environment Act legislation evolves, funding for nature improvements will become available through a range of sources such as the Gloucestershire Nature and Climate Fund[10], agri-environment schemes or through the delivery of biodiversity net gain through the planning system. The latter would also include off-site biodiversity net gain contributions, probably managed through the Nature and Climate Fund or similar.

Developers in Chipping Campden Parish are encouraged to approach development and the delivery of nature improvement and biodiversity net gain as follows:

- Consult the Local Nature Recovery map as a starting point to identify priorities and measures for nature recovery in Chipping Campden Parish.
- Where biodiversity net gain cannot be delivered on site, applicants are encouraged to work with Cotswold District Council to identify options for delivering off-site biodiversity net gain in Chipping Campden Parish. The following guide will be of interest:
  - Guidance on delivering Biodiversity Net Gain for planning applicants in Gloucestershire
- Where off-site biodiversity gain is proposed, this should ideally be focused on nature improvement areas shown in Figure 16 or the Gloucestershire Local Nature Recovery Map and within the parish.
- Expert ecological advice should accompany planning applications to demonstrate how long-term biodiversity net gains on-site or off-site will be delivered with enduring benefits, and long-term management where necessary.
- Only where off-site biodiversity improvements can be proven impossible to deliver within the parish should off-site and out-of-parish biodiversity improvements be considered.
- It would be helpful for planning proposals to demonstrate that landowners of sites where

nature improvement or biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery.

Table 7: Existing habitat features that could be improved for the purposes of biodiversity gain and local nature improvement / recovery

Map number	NRA name	Improvement focus based on existing features
1	River Cam corridor	• Riparian habitat • Grassland • Woodland • Scheduled Monument • Traditional orchard
2	River Cam and Campden Wood	• Riparian habitat • Woodland
3	West Chipping Camden a. Leasows Farm b. Westington	• Traditional orchard
4	Dounor House	• Traditional orchard
5	Mickleton woodland	• Woodland • Riparian habitat
6	Kingcombe Lane & the Cley	• Traditional orchard • Woodland
7	Hillsdown Farm	• Traditional orchard
8	Broad Campden south	• Riparian corridor • Traditional orchard
9	Sedgecombe	• Woodland • Wildlife corridor (verges)
10	Hollybush Farm	• Woodland • Riparian habitat
11	The Gate House	• Opportunities to enhance wildlife corridors and connectivity • Woodlands
12	Hare Park Plantation	• Opportunities to enhance wildlife corridors and connectivity • Woodlands
13	Sally Beds	• Woodland • Riparian habitat







Policy 5:

Biodiversity Net Gain and Local Nature Recovery

Land identified in Table 7, Figure 16 and Appendix 6 is designated as the Chipping Campden Local Nature Recovery Areas for inclusion in the Gloucestershire Local Nature Recovery Map under provisions of the Environment Act 2021.

Proposals that are required to provide biodiversity net gain must demonstrate that those requirements have been fully addressed as follows:

a. **Contact Cotswold District Council to determine whether work has been done towards the preparation of the Gloucestershire Local Nature Recovery Strategy regarding the proposal site, its relationship with the Gloucestershire Local Nature Recovery map, and seek advice on how best to deliver local nature recovery and biodiversity net gain within that context.**
b. **Where biodiversity net gain cannot be delivered on site, applicants must work with Cotswold District Council to identify ways that off-site biodiversity net gain can be delivered in Chipping Campden Parish.**
c. **Where off-site biodiversity gain is proposed, this should be focused on the nature recovery areas shown in Figure 16 or the Gloucestershire Local Nature Recovery Map.**
d. **Expert ecological advice should accompany planning applications to demonstrate how long-term biodiversity net gains on-site or off-site will be delivered with enduring benefits, and long-term management where necessary.**
e. **Only where off-site biodiversity improvements can be proven impossible to deliver within the parish can off-site and out-of-parish biodiversity improvements be considered.**

Planning proposals must demonstrate that landowners of sites where biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery.

Policy 6: Local Green Spaces

Objective

- **To protect existing green spaces and to increase the provision of green spaces**

Chipping Campden's character is defined in large part by the available local green spaces that provide opportunities for the community to gather, celebrate, play and relax. The green spaces are in many forms: local amenity grassland in the town centre, historical features, places of tranquillity or for organised sporting activities.

The CCNDP is allocating the following sites as Local Green Spaces shown in **Figure 17** according to the provisions of the NPPF (December 2024). Full descriptions and detailed maps are provided in **Appendix 7**.

Some of these sites such as Bratches Allotments, Bowling Green and the Cricket Ground already have some level of protection making development challenging but not impossible. However, they are included here to provide an even greater level of protection, ensuring that they remain available to the community in the very long term.

National Planning Policy Framework policies apply for this:

106. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period.	107.The Local Green Space designation should only be used where the green space is: (a) in reasonably close proximity to the community it serves; (b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and (c) local in character and is not an extensive tract of land.	108. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

Figure 17: Local Green Spaces in Chipping Campden Parish



Source: Andrea Pellegram Ltd, under OS licence AC0000808712







Policy 6:

Local Green Spaces

Land identified in Figure17, Appendix 7 and listed below is designated as Local Green Space.

1. **Berrington Road**
2. **Leysbourne**
3. **High Street**
4. **Memorial Green**
5. **Castle Gardens Play Area**
6. **Olimpick Drive Play Area**
7. **Littleworth**
8. **Westington**
9. **The Mound, Broad Campden**
10. **Court Barn/Cartwash**
11. **Recreation Ground**
12. **Bowling Green**
13. **Cricket Ground**
14. **Ernest Wilson Garden**
15. **Wold's End Orchard**
16. **Badger's Field**
17. **Calf Meadow**
18. **Allotments**
19. **The Hoo West**
20. **The Hoo East**
21. **The Cley**
22. **The Craves**

Appendices



Appendix 1. Creative Industries

Chipping Campden owes much of its beauty to the design skills of the 15th century craftsmen who built the gently-curving, honey-coloured High Street. Many appreciate Campden for just that glimpse of the past. And yet behind the golden façades, a new generation of creative individuals and businesses is thriving.

Artists, writers, graphic designers, photographers, jewellers, digital media providers and musicians are amongst the many to whom Chipping Campden is home. Further details are available on the Creative Campden website creativecampden.co.uk

Performance & Exhibition

Campden Edge
campdenedge.org
Youth Arts Fund

Campden Gallery
campdengallery.co.uk
High Street, Chipping Campden, GL55 6AG
Art Gallery

Campden Literature Festival
campdenmayfestivals.co.uk
Old Police Station, High Street, Chipping Campden, GL55 6HB
Literature Festival

Campden Music Festival
campdenmayfestivals.co.uk
Old Police Station, High Street, Chipping Campden, GL55 6HB
Concert Organiser

Campden Music Winter Season
campdenmusic.org.uk
St James' Church, Church Street, Chipping Campden
Concert Organiser

Charles Matthews
charlesmatthews.co.uk
Musician

Cidermill Theatre
cidermilltheatre.com
Chipping Campden School, Cidermill Lane, Chipping Campden, GL55 6HU
Theatre

Court Barn Museum
courtbarn.org.uk
Church Street, Chipping Campden, GL55 6JE
Arts & Crafts Museum

Gallery at the Guild
The Old Silk Mill, Sheep Street, Chipping Campden, GL55 6DS
Artists' Cooperative

Generation Jones
geoffmcarr@hotmail.com
Musician

Rachel Horton Kitchlew
rhortonkitchlew.co.uk
Musician

Andrew James Music
andrewjamesmusic.co.uk
Musician

Visual Arts

Betty Stocker
Cherry Orchard Close, Chipping Campden
Photographer

Campden Innovation Lab
gloucestershire.gov.uk/libraries/library-services/the-lab/
The Library, High Street, Chipping Campden, GL55 6AT
Creative technology support

David Birch
thegalleryattheguild.co.uk
Gallery at the Guild, Sheep Street, Chipping Campden, GL55 6DS
Artist: Teaching sessions

Geoffrey Jackson
geoffreyjackson.com
Artist

Houghton Art
jeremyhoughton.co.uk
6 High Street, Chipping Campden, GL55 6AT
Artist

Louise Goves
louisegovesillustrations.co.uk
Illustrator, Card Maker

Rachel Swallow Photography
Photographer

Simon Hanagarth Photography
simonhanagarthphotography.co.uk
5 Grafton Mews High Street, Chipping Campden
Photographer

Susan Rosenberg
rosenberg-art.com
Orchard Lawn, Broad Campden, GL55 6UU
Artist

Terry Morgan
terrymorganphotography.co.uk
42 Castle Nurseries, Chipping Campden, GL55 6NT
Photographer

Artisans and makers

Bay Tree
thebaytreeatcampden.com
High Street, Chipping Campden, GL55 6AG
Floristry

Caroline Groves
carolinegroves.com
Bespoke Shoes

Caroline Richardson
carolinejewellery.co.uk
The Old Silk Mill, Sheep Street, Chipping Campden, GL55 6DS
Jeweller

Covent Garden Academy of Flowers
academyofflowers.com
High Street, Chipping Campden, GL55 6HB
Floristry School

Harts Silversmiths
hartsilversmiths.co.uk
The Old Silk Mill, Sheep Street, Chipping Campden, GL55 6DS
Silversmiths

Lisa Drinkwater Flowers
lisadrinkwaterflowers.wordpress.com
Floristry

Mooch
moochcotswolds.co.uk
Blacksmiths House, High Street, Chipping Campden, GL55 6DR
Fabric designs

Mary Day Silks
marydaysilks.com
Gallery at the Guild, Sheep Street, Chipping Campden, GL55 6DS
Silk Artist

Niki Crew
@nikicrewart - insta
9 Catbrook, Chipping Campden, GL55 6DF
Glass Artist

Ridge & Furrow
ridgeandfurrowceramics.com
Ceramacist

Robert Welch
robertwelch.com
Lower High Street, Chipping Campden, GL55 6DY
Cutlery, Homeware Design

Sam Wilson Studio
samwilsonstudio.com
Elsley House, High Street, Chipping Campden, GL55 6HA
Homewares

Stefan Day
stefandaysilver.co.uk
Gallery at the Guild, Sheep Street, Chipping Campden, GL55 6DS
Jeweller

Digital design and publishing

Fiell Publishing
fiell.com
Barley Mow High Street GL55 6AG
Publishing

Loose Chippings
loosechippings.org
Pan's Place, Back Ends, Chipping Campden, GL55 6AU
Publishing & Design

Shire Marketing
shiremarketingspecialists.co.uk
9 The Cambrook, Chipping Campden, GL55 6AT *Marketing*

Food and Drink

Bantam Tearooms
bantamtea-rooms.co.uk
High Street, Chipping Campden, GL55 6HB
Tearooms & B&B

Campden BRI
campdenbri.co.uk
Campden BRI, Station Road, Chipping Campden, GL55 6LD
Food & drink research / science

Campden Coffee
The Old Silk Mill, Sheep Street, GL55 6DS
Coffee shop

Cotswold House Hotel
bespokehotels.com/cotswoldhouse/dining
The Cotswold House Hotel, The Square, Chipping Campden, GL55 6AN
Hotel & two restaurants

Crystal Palace Chinese Takeaway
mealmap.co.uk/crystalpalace
13 Sheep Street, Chipping Campden, GL55 6DS
Chinese takeaway

Da Luigi Bistro
daluigi.co.uk
High Street, Chipping Campden GL55 6HB
Italian restaurant

Eight Bells Inn
eightbellsinn.co.uk
Church Street, Chipping Campden, GL55 6JG
Pub, restaurant & B&B

Fillet & Bone
filletandbone.co.uk
High Street, Chipping Campden, GL55 6AT
Delicatessen, Butcher, Fishmonger

Huxley's Brasserie
cafehuxleys.co.uk
High Street, Chipping Campden, GL55 6AL
Brasserie & café

Huxley's Bakery
cafehuxleys.co.uk/bakery
High Street, Chipping Campden, GL55 6AL
Bakery & takeaway

Little Oak Vineyard
littleoakvineyard.com
Little Oak Cottage Paxford Road, Chipping Campden, GL55 6LA
Vineyard & wine producer

Lygon Arms
lygonarms.co.uk
High Street, Chipping Campden, GL55 6HB
Hotel, restaurant & pub

Maylams
find-open.co.uk/chipping-campden/maylams-1723458
High Street, Chipping Campden, GL55 6HB
Delicatessen, fine foods

Michael's Restaurant
michaelsmediterranean.co.uk
High Street, Chipping Campden, GL55 6AG
Restaurant

MorHQ
morbakery.co.uk
Unit 8 Battlebrook Drive, Campden Business Park, GL55 6JX
Bakery & breadmaking courses

The Noel Arms Hotel
bespokehotels.com/noelarmshotel/
High Street, Chipping Campden, GL55 6AT
Hotel, restaurant & pub. Folk music venue

The Red Lion Tavern
redliontavern.co.uk
Lower High Street, Chipping Campden, GL55 6AS
Pub, restaurant & B&B. Folk music venue

Toke's Food & Drink
tokesfoodanddrink.co.uk
Toke's, High Street, Chipping Campden, GL55 6AG
Delicatessen, wine shop & event caterer

Victor's
facebook.com/victorschippingcampden/
High Street, Chipping Campden, GL55 6AT
Sandwich bar & café

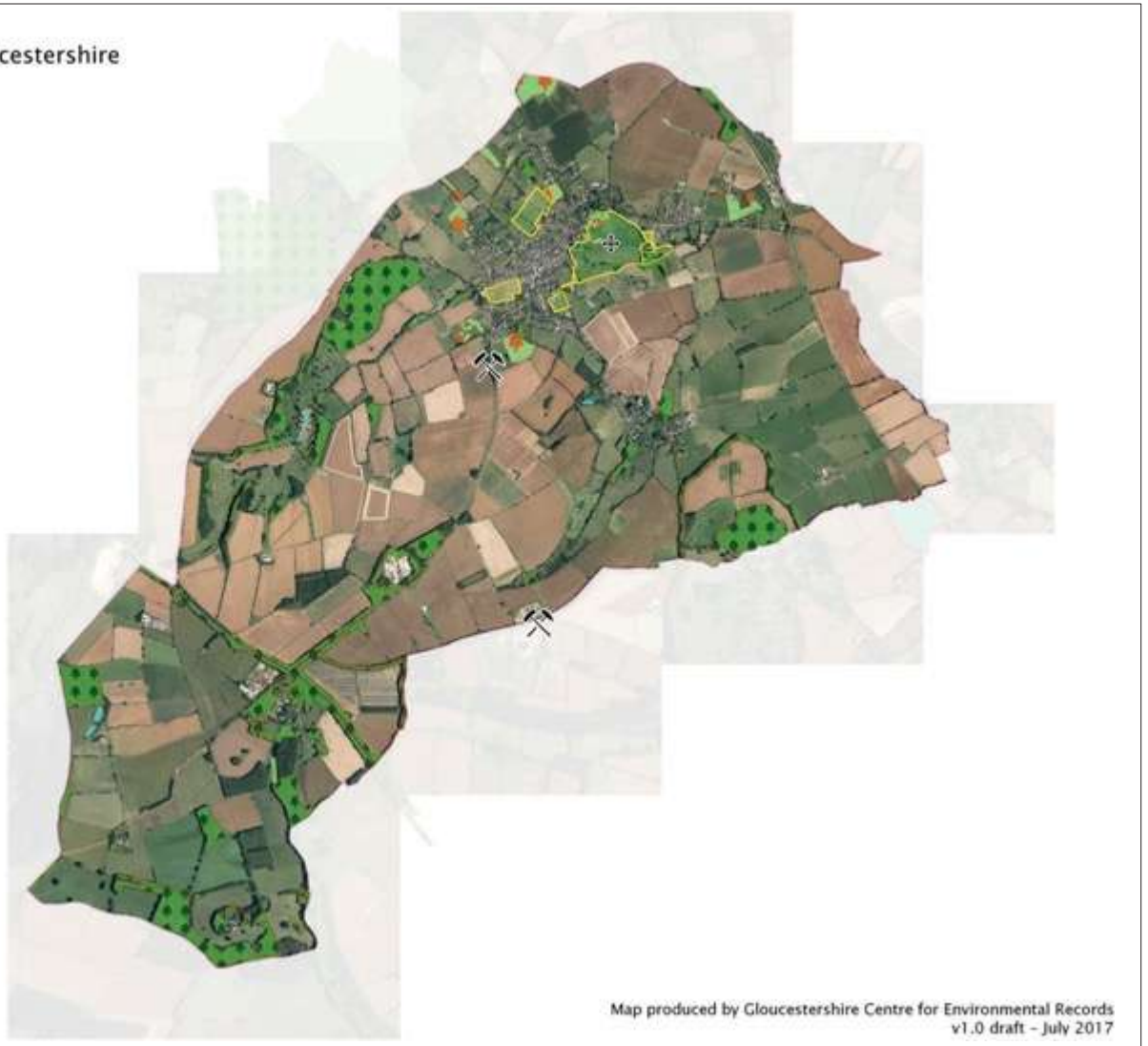
The Volunteer Inn
thevolunteerinn.net
St. Catharine's Square, Chipping Campden, GL55 6DY
Pub, Indian restaurant & B&B

Bromleys of Cotswolds
bromleysofcotswolds.co.uk
Hook House, High Street, Chipping Campden, GL55 6AT
Coffee shop

Appendix 2. Natural Environment

This data was prepared in 2017. Data on environmental features can become out of date and is therefore regularly updated. Applicants are encouraged to ensure that the data they use in the preparation of their proposals is up to date. This data is provided for illustrative purposes only.

Natural and landscape features
Chipping Campden parish, Gloucestershire

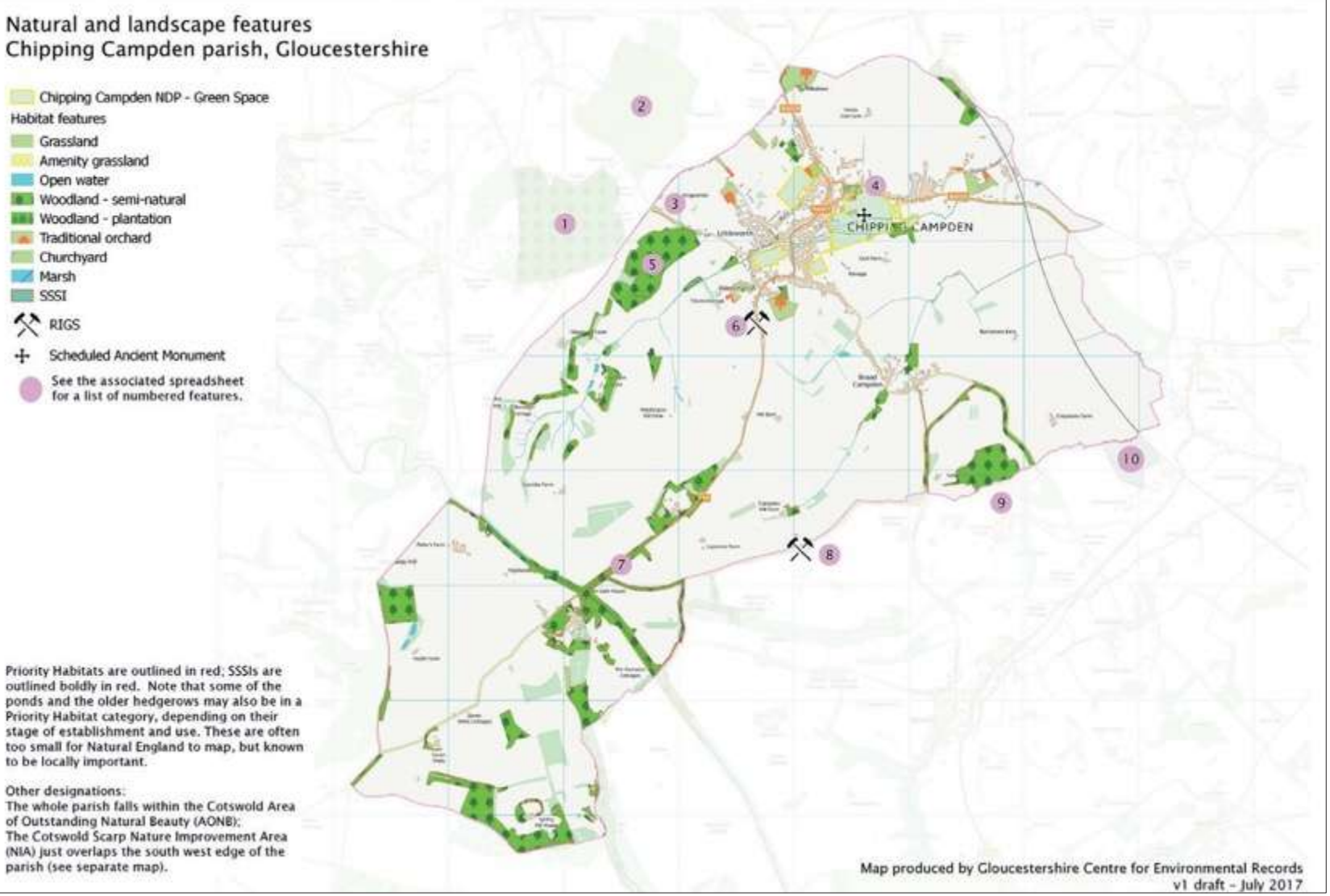


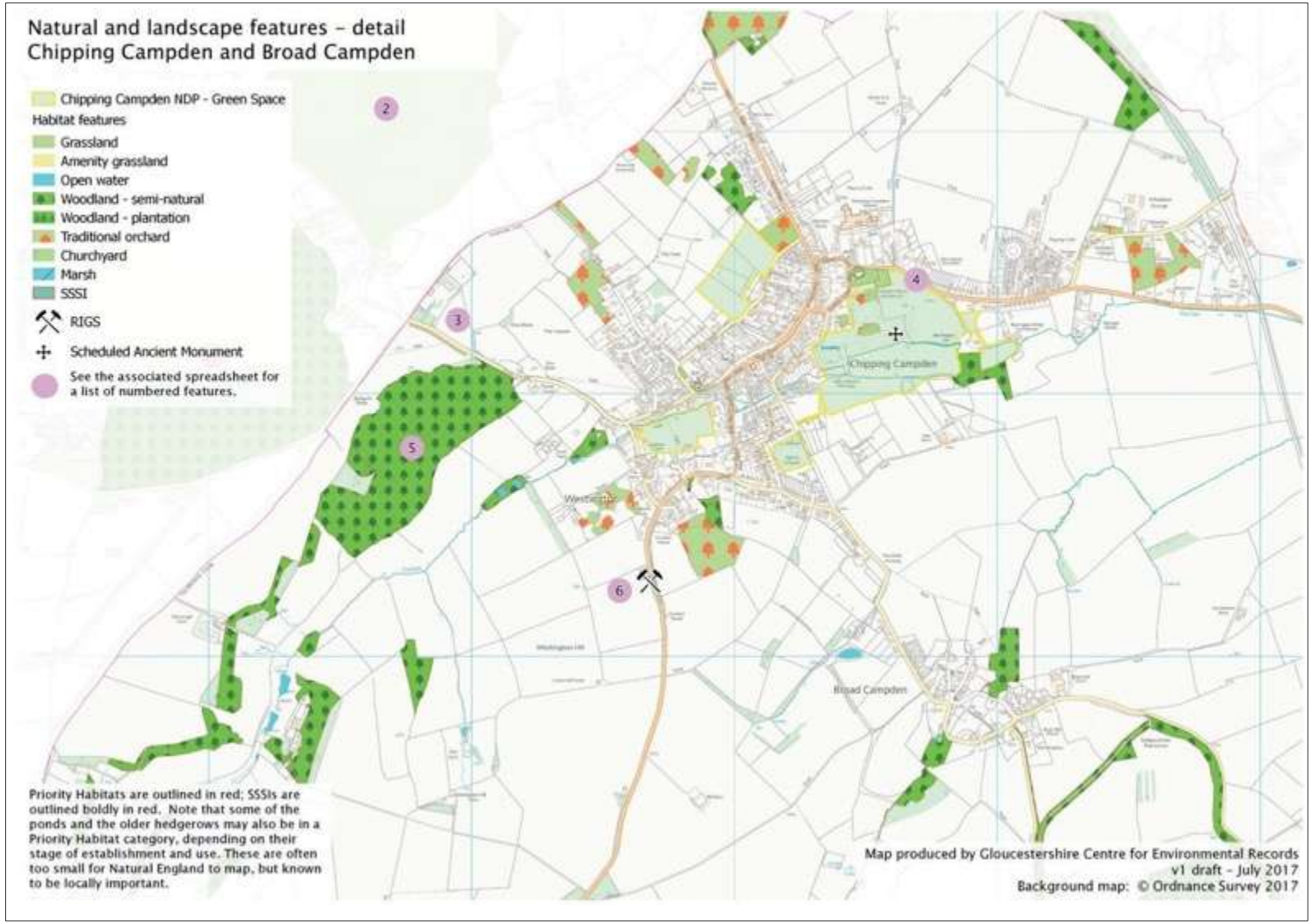
Priority Habitats are outlined in red; SSSIs are outlined boldly in red. Note that some of the ponds and the older hedgerows may also be in a Priority Habitat category, depending on their stage of establishment and use. These are often too small for Natural England to map, but known to be locally important.

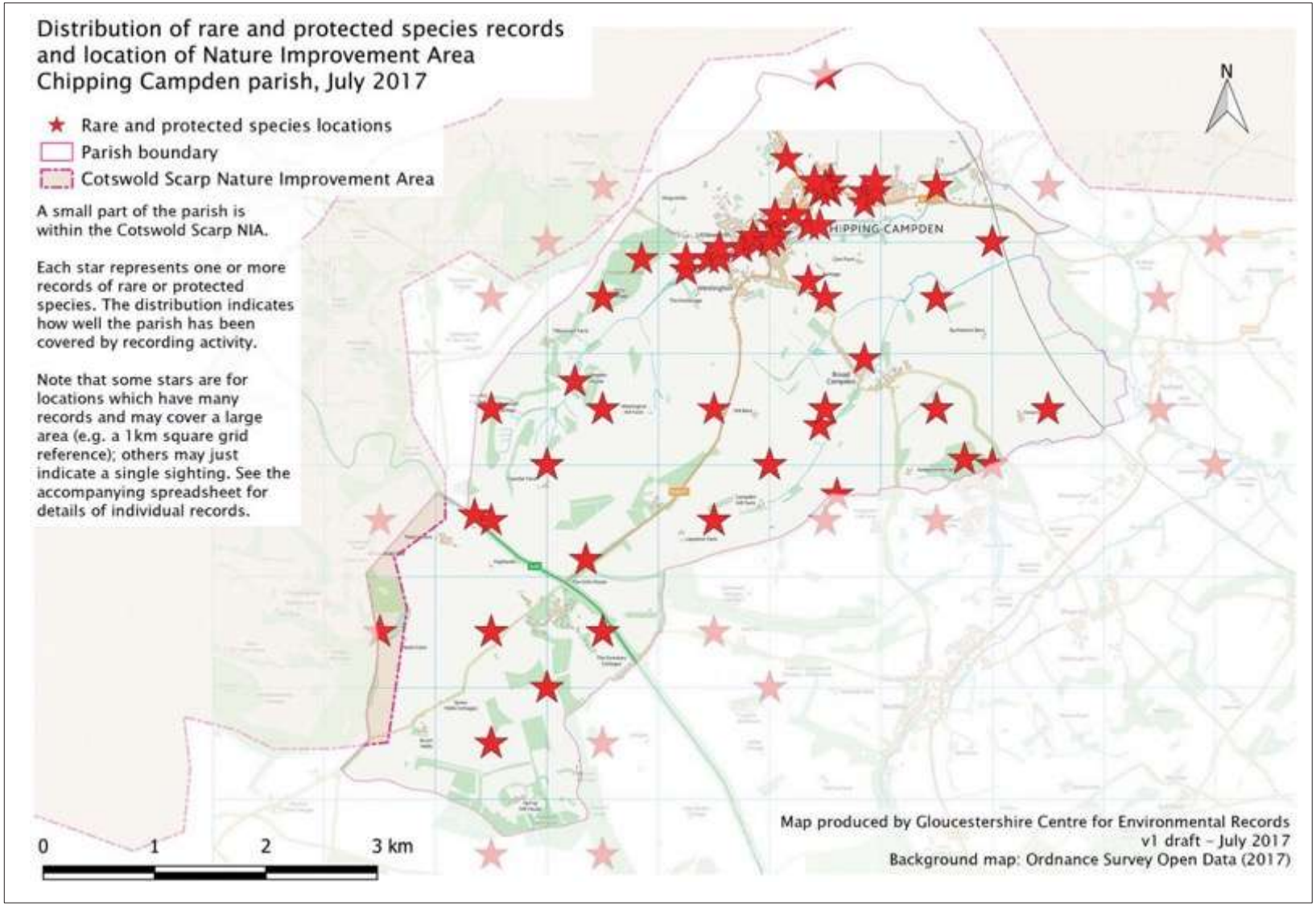
Other designations:
The whole parish falls within the Cotswold Area of Outstanding Natural Beauty (AONB);
The Cotswold Scarp Nature Improvement Area (NIA) just overlaps the south west edge of the parish (see separate map).

Map produced by Gloucestershire Centre for Environmental Records
v1.0 draft - July 2017

Natural and landscape features
Chipping Campden parish, Gloucestershire




Natural and landscape features – detail
Chipping Campden and Broad Campden
Chipping Campden NDP - Green Space
Habitat features
Grassland
Amenity grassland
Open water
Woodland - semi-natural
Woodland - plantation
Traditional orchard
Churchyard
Marsh
SSSI
RIGS
Scheduled Ancient Monument
See the associated spreadsheet for a list of numbered features.
2
3
4
5
6
Chipping Campden
Broad Campden
Priority Habitats are outlined in red; SSSIs are outlined boldly in red. Note that some of the ponds and the older hedgerows may also be in a Priority Habitat category, depending on their stage of establishment and use. These are often too small for Natural England to map, but known to be locally important.
Map produced by Gloucestershire Centre for Environmental Records
v1 draft - July 2017
Background map: © Ordnance Survey 2017


Distribution of rare and protected species records and location of Nature Improvement Area Chipping Campden parish, July 2017
Rare and protected species locations
Parish boundary
Cotswold Scarp Nature Improvement Area
A small part of the parish is within the Cotswold Scarp NIA.
Each star represents one or more records of rare or protected species. The distribution indicates how well the parish has been covered by recording activity.
Note that some stars are for locations which have many records and may cover a large area (e.g. a 1km square grid reference); others may just indicate a single sighting. See the accompanying spreadsheet for details of individual records.
N
HIPPING CAMPDEN
0
1
2
3 km
Map produced by Gloucestershire Centre for Environmental Records
v1 draft - July 2017
Background map: Ordnance Survey Open Data (2017)

Number	Name	Type	Status	Comments	Hectares	Source
1	Weston Park KWS	Deciduous woodland	Key Wildlife Site, Priority Habitat	Ancient semi-natural broad-leaved woodland (just outside the parish boundary)	74.61987	GCER KWS layer
2	Dover's Hill KWS	Grassland	Key Wildlife Site, Priority Habitat	Large National Trust area of fields and woodland (just outside the parish boundary). Invertebrate interest.	73.68912	GCER KWS layer
3	Chipping Campden (Dyer's Lane) CRV	Grassland	Conservation Road Verge	Rank grass bank with very small population of sweet cicely, adjacent to Campden Wood KWS	0.18140	GCER CRV layer
4	Campden House	Garden, Medieval earthworks	Scheduled Ancient Monument	Campden House, formal Garden and associated Medieval cultivation earthworks.		English Heritage download
5	Campden Wood KWS	Deciduous woodland	Key Wildlife Site, Priority Habitat	Ancient semi-natural broad-leaved woodland site larger than 2 ha	26.03183	GCER KWS layer
6	Holt Quarry	Good exposure of the Cotswold Sands	RIGS	Former quarry workings now covered by graded slope of thinnish woodland		GCER RIGS layer (c/o Gloucestershire Geology Trust)
7	Chipping Campden (B4081) CRV	Grassland	Conservation Road Verge	Secondary woodland flora including c10 sweet cicely plants at the southern end of verge on the south side of the road	0.20746	GCER CRV layer
8	Stanley's Quarry	Research and all levels of education	RIGS	A large, active working quarry, exposing the Lower Freestone of the Inferior Oolite almost at its north-eastern limit. The quarry lies immediately west of the Vale of Moreton axis. The beds in the quarry are almost horizontal.		GCER RIGS layer (c/o Gloucestershire Geology Trust)
9	Sedgecombe Plantation KWS	Deciduous woodland	Key Wildlife Site, Priority Habitat	overlaps the parish boundary	16.98550	Natural England Priority Habitat Inventory v2.1 2016
10	Wellacre Quarry	SSSI	SSSI	the best exposures in Britain of part of the Lower Jurassic, Middle Lias rock succession. Rich in fossils. This is the subdivision called Luridum Subzone.	12.14909	Natural England GIS data download
10	Next to Wellacre Quarry SSSI	Deciduous woodland	Priority Habitat - also edge of SSSI		0.67436	Natural England Priority Habitat Inventory v2.1 2016



Appendix 3. Town Centre Land Uses

Table of Town Centre uses (Data gathered October 2023) showing use for ground floor and entire property unless otherwise stated. See also maps below.

High Street heading West, North side

Ivy House
C3

Grevel House
C3

St James (the Old School House) C3

The Malt House C3

Seymour House C3

Westcote House
C3

Three Gables
C3

Trinder House C3

Clifton House
C3

Tokes
Eb; Upper floor C3

Campden Art Gallery
F1

Kendal House
Ea; Upper floor C3

Dragon House Cottage
C3

Dragon House C3

Martins Cottage
Ea

Little Martins
Ea

The Martins C3

Sundial House
Green Dragon Interiors
Ea;
Upper floor C3

Moreton House
C3

Jackson Stops Ec

Michael's Restaurant
Eb; Upper floor C1

London House C3

St Annes
C3

Montrose House
C3

Cotswold House SG;
Upper floor C1

Kings Hotel Unused
- was hotel

Darby House
C3

The Firs
C3

Drury House
Ec

Dial House
C3

Babtist Church
F1

Peyton House
C3

Twine House
C3

Poppett's
C3

Green Dragon
C3

Mullion House C3

Crosby House
C3

Churchill House Ea;
Upper floor C3

Pedlar's House
Ea

Elm Tree House
C3

Not in use (front ground floor – formerly Butty's), J Gabb Solicitors at rear E

The Old Bakehouse C3

The Old Presbytery C3

High Street heading East, South Side

Plough House
C3

Robert Welch Studios Ea

Down Sheep Street, West Side, away from High Street B4081

2 Sheep Street
Draycott Books Ea;
Upper floor C3

3 Sheep Street
Ann Paul Hairdresser
Ea; Upper floor C3

4 Sheep Street
C3

5 Sheep Street
C3

6 Sheep Street
C3

7 Sheep Street
C3

The Silk Mill
F1, Ea, Eb

Sheep Street, East Side, heading towards High Street

Public Conveniences

Red Lion PH
– Folk music
venue Sui
generis

High Street heading East from Sheep Street B4081

Red Lion PH
– Folk music
venue Sui
generis

One Stop Shop
Ea

Victor's
Eb; Upper floor C3

Blacksmith's House
Mooch – Fabric design
artist Ea

Blacksmith's House
James Adcock
Cabinet maker E;
Upper floor E

Blacksmith's House
Silver Lily Jewellery
Ea

Cambrook Court - 10 units

From entrance on left Ea,
Ea, Ea, Ea, Ea

From entrance on right Eb,
Ea, Ea, Ea, Ec

Behind Campden Court Block

Joy's soft furnishings Ea,
Upper floor Ec

Peridot Digital & Post Office
Ea, Upper floor Ec

Beyond Post Office
Storage B8

Opposite Post Office
12 garages

Continuing up High Street from Campden Court

Prior House
Art Gallery
F1; Upper floor C3

Hidden Beauty Ea;
Upper floor C3

Lisa Drinkwater Florist
Ea; Upper floor C3

The Attic
(behind LD
Florist) Ea

Grafton House
Estate Agent
Ec

Dentist (behind Grafton
House) Ec

Fillet & Bone
Ea, Eb

The Butchers flat
(behind Fillet & Bone)
C3

The Old Abattoir
(behind Fillet & Bone)
C3

Storage (behind Fillet
& Bone)
B8

Bromleys of
Cotswolds Eb

Hook House
Ea

Library
F1

Julie Sullivan
Funeral Directors E

Noel Arms Hotel –
Folk music venue
C1

Behind Noel Arms - 4 properties
C3, C3, C3, C3

Elsley House
Ea

12-14 High Street,
The Co-operative
Ea

Behind Co-op - storage
B8

Badger's Hall
C3

The Old Police Station
- front
Dandelion Ea

The Old Police Station - Tourist information, Council Office, meeting rooms, cinema
sui generis

Behind Old Police Station - toilets

Behind Old Police Station 5 properties C3, C3, C3, C3, C3,

The Guild House
Bantam Tea Rooms Eb

Da Luigi's Bistro Eb

Masonic Lodge (above Da Luigi's) Sui generis

Passageway leading to 6 properies
C3, C3, C3, C3, C3, C3,

Stuart House
Ea; Upper floor C3

Cheltenham House Hairdresser
Sui generis; Upper floor C3

The Old Grammar School
C4; Upper floor C4

Fereby House
C3

Maylams
Ea; Upper floor C3

Saxton House C3

Dover's House
C3

The Lanterns C3

Amberley House C3

Lygon Arms (main) C1

Lygon Arms (other side of passageway)
Ea

Braithwaite House (former Lloyd's Bank) C4
application permitted by CDC

Braithwaite House (other side of passage – former Tricer) C4
application permitted by CDC

Symes House
Floral art academy
F1; Upper floor C3

Woolstapler's House
C3

Woolstapler's Hall
C3

Singer House
C3

Bedfont House
C3

Woodward House
C3

Through passageway

The Coach House
C3

The Groom's Lodge
C3

Chestnut Tree Cottage
C3

Sherbourne Mews
C3

After passageway

Chestnut Tree House
C3

Pharmacy - dispensary, consulting rooms, defibrillator
Ec

Island in High Steet near Sheep Street. Clockwise from western end

Rosary Cottage
C3

Empty property being renovated

Huxley's
Eb

Bread maker / shop
Ea, Eb

Hairdressers Sui generis

Barbers Sui generis

Island adjacent to west end of car park

Cotswold Luxe
Ea

Market Square car park

Island in High Street with war memorial. From western end

Town Hall F1

Memorial Green - start of Cotswold Way

The Market Hall
National Trust


Class F
Sui Generis
Class C3 - dwellings
Class Ec - services
Class Eb - food and drink
Class Ea - retail
Town Centre Boundary
Poppetts
Green Dragon Close
Cottage
Island House
Rosary Cottage
140.5m
TCB
GP
PH
The Old
Davies Hs
Library
Hotel
Grafton House
Grafton Mews
Burgage House
House
Warland House
Cottage
El Sub Sta
PC
LB
142.0m
The Plough Cottage
Silk Mill Cott
Rear Tree Cott
Shreelaine
Francote
B 4081
Garage
FB
FB
Path
Cross Cottage


Class F
Sui Generis
Class C3 - dwellings
Class Ec - services
Class Eb - food and drink
Class Ea - retail
Town Centre Boundary
Rodings
Cotswold House Hotel
London House
Montrose
Sundial House
Dragon Ho
Little Martins Cottage
Brewers Cottage
School
House
Mkt
War Meml
Hotel
Town
HIGH STREET
The Firs
Island House
Grafton House
Library
Hotel
Noel Court
The Old Coach House
Badgers End
Farm
Alderley
CALF'S LANE


Class F
Class C3 - dwellings
Class Ec - services
Class Eb - food and drink
Class Ea - retail
Town Centre Boundary
B 4035
Hall
Surgery
Sherborn House
Mill Cottage
Ostlers Loft
Endymion
Bedfont
GLEBE FOLD
Symes House
Seymour Cottage
House
Hotel
Dragon Ho
Ellisons Cottage
The Cottage
Little Martins Cottage
Brewers
The Old
Lygon Arms
Flag Close
Mkt
Oak
GP
Mow
P

Appendix 4. Social and community infrastructure

With a description of each asset (from the list in para 11.2.2) and an explanation of why the asset is important to the Chipping Campden community.

Allotments



Chipping Campden Allotments
The Bratches, Aston Road, Chipping Campden, GL55 6JS

Allotments

Allows for the growing of vegetables, etc. with physical, health and economic benefits for residents, plus ecological advantages.

Care Homes



Mill House Care Home
55 Sheep Street, Chipping Campden, GL55 6DR

Care home for the elderly

Provides residential care for the elderly. Allows for those who need such care to stay in the locality.



Jecca's House (Campden Home Nursing)
Jecca's House, Aston Road, Chipping Campden, GL55 6HR

Charitable organisation providing nursing care for the terminally ill.

Provides nursing care for terminally ill residents of the town and surrounding area. Allows for those who need such care to be cared for in their own home.

Churches



St James' Church
Church Street, Chipping Campden, GL55 6JG

Historic Grade 1-listed C of E "Wool" church

One of the finest historic "wool" churches in England, it is the religious hub of the community. It hosts musical events of international calibre during the Music Festival.



Campden Baptist Church
High Street, Chipping Campden, GL55 6AL

Baptist Church

An active Baptist Church, one of the hubs for the religious community of the town. Provides location for Food Bank.



St Catharine's Church
Lower High Street, Chipping Campden, GL55 6DZ

Catholic Church

An active Catholic Church, the religious hub for the Catholic community of the town.



St Michael & All Angels Church
Broad Campden, GL55 6US

C of E Church in Broad Campden

Provides regular services for the inhabitants of Broad Campden

Churches



Friends Meeting House
Meeting House Lane, Broad Campden, GL55 6US

Quaker meeting house in Broad Campden

The location for meetings of the Society of Friends (Quakers) since 1663 it is the oldest building of its kind in UK still used for this.

Defibrillators



Berrington Road Defibrillator
Berrington Road, near junction with Station Rd.

Old red telephone kiosk housing defibrillator

Gives public access to a defibrillator, which may save lives



Broad Campden Defibrillator
Broad Campden, near Bakers Arms PH

Old red telephone kiosk housing defibrillator

Gives public access to a defibrillator, which may save lives



Leisure Centre Defibrillator
Chipping Campden School, Cidermill Lane, GL55 6HU

Defibrillator

Gives public access to a defibrillator, which may save lives

Defibrillators



Pharmacy Defibrillator
Pharmacy, High Street, Chipping Campden, GL55 6HB

Defibrillator

Gives public access to a defibrillator, which may save lives



Post Office / Peridot Digital Defibrillator
2c The Cambrook, High Street, Chipping Campden, GL55 6AT

Defibrillator

Gives public access to a defibrillator, which may save lives



St Catharine's Defibrillator
St Catharine's School, Lower High Street, GL55 6DZ

Defibrillator

Gives public access to a defibrillator, which may save lives

Dentists



Today's Dental Care
Grafton Mews, Chipping Campden GL55 6BW

Dentist

Provides dental examinations and treatment.

Dentists



Ashbee Dental Care
3 Ashbee House, Battlebrook Drive, GL55 6JX

Dentist

Provides dental examinations and treatment.

Doctors' Surgeries



Chipping Campden Surgery
Back Ends, Chipping Campden, GL55 6AU

Doctors' surgery

Doctors practice providing primary healthcare to the local community

Gardens and Parks



Ernest Wilson Garden
Leysbourne, Chipping Campden, GL55 6AD

Walled garden commemorating famous Campden plant-collector

A quiet, special, rest-area with seating in the centre of the town, providing a pleasant restful ambience plus information about this plant-collector of national importance.



Wolds End Orchard
Back Ends, Chipping Campden, GL55 6HR

Community-owned and maintained ancient orchard

The last ancient orchard of the town, now community-owned and maintained. Allows residents opportunity of physical exercise, learning about fruit-growing and ecology, and positive ecological impact. Hosts events like Apple Day and community picnic.

Fire Stations



Community Fire & Rescue Station
Catbrook, Chipping Campden, GL55 6DG

Fire & Rescue Station
Defibrillator

Provides fire and rescue services for Chipping Campden and surrounding area.

Gives public access to a defibrillator, which may save lives

Meeting Rooms



Church Rooms
Church Rooms, Calf Lane, Chipping Campden, GL55 6JQ

Function Room

Used for talks, meetings, community lunches. An important community hub for the parish.



Chipping Campden Town Hall
High Street, Chipping Campden, GL55 6AT

Meeting and Function Room (Town Hall)

Used for local craft and food markets, talks, meetings for local groups and societies, rural cinema and it is where meetings of the Town Council are held. An important hub for the artistic and civic life of the parish. Also, a weekly Chipping Campden Youth Club is held here.



The Old Police Station
High Street, Chipping Campden, GL55 6HB

Meeting and Function Room

Used for talks and cinema. Meetings of the History, Art and Cinema Societies are held here. An important hub for the artistic life of the parish. Also, houses

the Council Office for the Parish.

Meeting Rooms



Broad Campden Village Hall
Hall Close, Broad Campden, GL55 6UZ

Village Hall

Provides a meeting place and a facility for events for the residents of Broad Campden



Baden Powell Centre
Recreation Ground, Catbrook, Chipping Campden, GL55 6DA

Large hut on recreation ground, for scouts and other activities

Provides a venue for the local Scouts, Beavers and Brownies. Also available for hire for children's parties etc. Alongside the Recreation ground and sports facilities – important for the health and development of the local children.

Opticians



Dr C.P.Grey, Optician
Drury House, Chipping Campden, GL55 6AL

Optician

Provides eye examinations, screening for glaucoma, macular degeneration and other eye diseases.

Play Areas



Recreation Ground Play Area
George Lane, Chipping Campden, GL55 6DA

Play Area

An extensive play area with a wide variety of play equipment carefully maintained and landscaped. Provides important outdoor exercise and play facilities for the children of the parish.



Castle Gardens Play Area
Castle Gardens, Chipping Campden, GL55 6JR

Play Area

A play area with a variety of play equipment. Provides important outdoor exercise and play facilities for the children resident at this end of the town, which is distant from the larger play area at the recreation ground or at Olimpick Drive.



Olimpick Drive Play Area
Olimpick Drive, Chipping Campden, GL55 6BL

Play Area

A play area with a variety of well-maintained play equipment. Provides important exercise and play facilities for the children resident at this end of the town, which is distant from the larger play area at the recreation ground or at Berrington Road.

Post Offices



Chipping Campden Post Office
Peridot Digital, 2c Cambrook, High Street, GL55 6AT

Post Office

Provides a range of post-office services for the inhabitants of the parish and surrounding area, including banking services.

Public Houses



The Eight Bells
21 Church Street, Chipping Campden, GL55 6JG

Public House

Provides food, wide-ranging menu, hosts functions and events. Provides B&B accommodation



The Lygon Arms Hotel
High Street, Chipping Campden, GL55 6HB

Hotel & Public House

Although a hotel, functions as a public house for locals, serving food, and hosting functions and events. Also contains a shop selling clothes, gifts, food and culinary products.



The Noel Arms Hotel
High Street, Chipping Campden, GL55 6AT

Hotel & Public House

Although a hotel, functions as a public house for locals, serving food, and hosting functions and events.



The Red Lion Tavern
Lower High Street, Chipping Campden, GL55 6AS

Public House

A public house serving food and, hosting functions and events. Provides B&B accommodation.

Public Houses



The Volunteer Inn
Lower High Street, Chipping Campden, GL55 6DY

Public House

A public house, with an Indian restaurant. Hosts functions and events, particularly with live music. Provides B&B accommodation.



The Bakers Arms
Broad Campden, GL55 6UR

Public House

A public house serving food and, hosting functions and events.



Cotswold House Hotel
The Square, Chipping Campden, GL55 6AN

Hotel with two restaurants

A Hotel with two restaurants, which is much used by local people, and also with a Spa open to the local population.

Schools



Chipping Campden School
Cidermill Lane, Chipping Campden, GL55 6HU

Secondary School

A highly regarded and very successful secondary school, serving a wide catchment area around Chipping Campden.

Schools



St James & Ebrington C of E Primary School
Pear Tree Close, Chipping Campden, GL55 6DB

Primary School

The Church of England primary school serving the parish and surrounding area



St Catharine's Catholic Primary School
Lower High Street, Chipping Campden, GL55 6DZ

Primary School

The Catholic primary school serving the parish and surrounding area

Food Shops



The Co-operative ("Co-op")
12-14 High Street, Chipping Campden, GL55 6HB

A comprehensive food shop

Supplies a wide range of food and drink items, covering all the necessities of daily living. Allows for provisioning of local residents without travelling out of town. Improves the local economy and has a positive environmental impact.



Fillet & Bone
High Street, Chipping Campden, GL55 6AT

A food shop, delicatessen, fishmonger and butcher.

Supplies a wide range of food and drink items, including delicatessen items, fresh meat and fresh fish. Allows for provisioning of local residents without travelling out of town. Improves the local economy and has a positive environmental impact. The only butcher and fishmonger in the town.

Food Shops



The One-Stop Shop
High Street, Chipping Campden, GL55 6AT

A comprehensive food shop

Supplies a wide range of food and drink items, covering all the necessities of daily living. Allows for provisioning of local residents without travelling out of town. Improves the local economy and has a positive environmental impact. Contains the only free cashpoint machine in the town.

Spas



Cotswold House Hotel Spa
Cotswold House Hotel, The Square, GL55 6AN

Spa, with a variety of associated treatments

Provides facilities for a variety of spa treatments. Allows for relaxation and revitalisation. Available to local population.

Sports Facilities



Recreation Ground
George Lane, Chipping Campden, GL55 6DA

Large green space with sports pitches and play area

Covenanted fields providing a football pitch, landscaped children's play area and picnic area. Provides outdoor space for physical recreation for residents of and visitors to the parish.



Chipping Campden Bowling Club
Station Road, Chipping Campden, GL55 6LB

Full-size bowling green with clubhouse with bar and kitchen facilities

Full sized bowling green and clubhouse with bar and other facilities for hosting functions and events. Offers opportunity for physical activity, particularly for older residents.

Sports Facilities



Chipping Campden Cricket Club
Station Road, Chipping Campden, GL55 6LB

Large cricket pitch with large pavilion

Large cricket ground supporting teams of all ages from young children up, including women's teams. Coaching provided at all levels. Large pavilion with bar and dining facilities for hosting functions and events. Allows for physical recreation for the local population.



Chipping Campden Tennis Club
Recreation Ground, George Lane, GL55 6DA

Four floodlit tennis courts with clubhouse

Provides facilities for playing tennis, along with coaching. Extensively used – 150 adult members and 70 juniors. Allows for physical recreation of local population.



The Leisure Centre
Chipping Campden School, Cidermill Lane, Chipping Campden, GL55 6HU

Leisure Centre

Provides facilities for playing tennis, a variety of indoor sports, weight-training and swimming.
Very important for the health of residents and for training for sports e.g. swimming.

Toilets



Sheep Street Public Conveniences
Sheep Street, Chipping Campden

Toilets

Male and female public conveniences. They are signposted from the high street, and given the tourism industry of the town, they are an important facility.

Toilets



Toilets at The Old Police Station
The Old Police Station courtyard, The Old Police Station, High Street, GL55 6HB

Toilets for public use

Male and female public conveniences. Given the tourism industry of the town, they are an important facility.

Theatres, Museums and Libraries



Court Barn Museum
Church Street, Chipping Campden, GL55 6JE

Museum

Museum displaying jewellery, paintings, prints, furniture and other types of creative art, together with an exhibition relating to the presence of C. Ashbee and the Arts & Crafts movement in Chipping Campden in the early part of the 20th Century. It highlights and showcases the creative heritage of the local community.



Cidermill Theatre
Chipping Campden School, Cidermill Lane, Chipping Campden, GL55 6HU

Theatre and performance venue

A modern theatre providing a venue for plays, musical performances and other types of performing art. Used by outside professional groups as well as local schoolchildren. Enriches the cultural lives of the residents of the parish and surrounding area and provides important educational opportunities for our children to study acting, musical performance and associated



activities.

The Old Silk Mill
Sheep Street, Chipping
Campden, GL55 6DS

Gallery and workshops of creative artists & café

This historically important building, which from 1902 housed the Guild of Handicrafts movement led by CR Ashbee, showcases the works of local artisans and provides workshops for them to work. It enriches the lives of inhabitants and is attractive to tourists and so also has economic value.

Theatres, Museums and Libraries



Chipping Campden Library
High Street, Chipping Campden, GL55 6AT

Library

Provides books, book search, internet facilities and photocopying for the community and Business Hub facilities.



Chipping Campden Visitor Information Centre
The Old Police Station, High Street, GL55 6HB

Visitor Information Centre

Tourism is an important industry for the town, and the Information Centre provides information for tourists and enhances their experience, which helps promote our tourism. Ticket sales, lost property, safe refuge and retail of maps, guidebooks and souvenirs.

Appendix 5. Non-designated heritage assets

With a description of each asset and an explanation of why the asset meets any of the criteria in the Cotswold Local Plan Policy EN12, Table 6 pages 156/157, e.g.

- Architectural interest
- Historic interest
- Age
- Rarity
- Aesthetic merits
- Selectivity or representativeness
- Integrity or “sense of completeness”
- Historic association
- Landmark status
- Group value

NDHA 1
The Millenium Sign



High Street,
Chipping Campden

Sign, created for Millenium Celebrations

This sign was created for Campden’s millennium celebrations. There is a metal snail crawling up the ironwork, which is the signature of the metalworker, Jeff Humpage, who created the sign. It is sought out by tourists. It thus has aesthetic interest; an historic association; and a local landmark status.

NDHA 2
Westington Street Lamp



Westington Green

Streetlamp

This streetlamp was a gift to the town by George Haines (whose descendants remain local landowners) in the late 19th Century. It is believed to have come from Westminster Bridge in London. It is thus of historic interest, and it is an attractive local landmark.

NDHA 3
High Street Stamp Box



High Street,
Chipping Campden

Period stamp dispenser

This postage stamp dispenser was installed here when Elsley House became the post office in 1967. It has an historical interest for the community and is a rare example of its type.

NDHA 4
St Catharine's postbox



High Street,
Chipping Campden

Victorian postbox

This is the earliest postbox in Chipping Campden, installed in 1895. It is of historic interest.

NDHA 5
Westington postbox



Westington,
Chipping Campden

Victorian postbox

This is the second earliest postbox in Chipping Campden, installed in 1896. It is of historic interest.

NDHA 6
High Street postbox



Elsley House, High St, Chipping Campden, GL55 6HA

Elizabethan postbox

This is a striking Elizabethan postbox on the High Street in the wall of what used to be the post-office, from 1967 to 2016. It is of historic interest and for a long time the premises were the town post-office.

NDHA 7
The Scuttlebrook



Aston Road, Chipping Campden

Open section of the Scuttlebrook (Cattlebrook)

The Scuttlebrook, named from Cattle Brook, flowed along the Leysbourne end of the High Street until it was covered in 1831. This is the only remaining open section and has historical significance for the town.

NDHA 8
Town Pump



Leysbourne,
Chipping Campden

Old water pump

The Reverend Lelend Noel had this pump installed in 1832 to provide water for the poor. It possibly is on the site of an older pump that existed in this area. It is of historic interest to the town.

NDHA 9
Cotswold Way marker



Adjacent to market square,
Chipping Campden

Stone marking start of The Cotswold Way path

This stone marks the start of the 102-mile Cotswold Way path from Chipping Campden to Bath. It was unveiled in 2014 and is of limestone with a central brass acorn motif. The wording is from the 2nd of T.S.Eliot's Quartet poems, Burnt Norton (which is nearby) which he was inspired to write on one of his many visits to Campden. This is thus of architectural, historic and landmark value to the town.

NDHA 10
Broad Campden postbox



Broad Campden GL55 6UR

George VI postbox

This is a good example of a George VI post box and has architectural and historical interest.

NDHA 11
Punk stone carving



Old School House, High St,
Chipping Campden

Stone carving

This stone carving was produced by local stone carver Ian Ashurst in 1977. It is aesthetically interesting and one of the landmarks on the High Street.

NDHA 12
Graham Greene Blue Plaque



Little Orchard Cottage, Hoo Lane, GL55 6AZ

Plaque commemorating previous resident

The novelist Graham Greene lived in Campden for 2 years from 1931-33, writing his first successful novel, Stamboul Train whilst here. The plaque commemorates the historic association with this now famous resident.

NDHA 13
Grevel House sundial



Grevel House, High Street, GL55 6AG

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic feature of the town. This one is on the oldest houses in the town (14th Century), but the dial itself dates from 1815.

NDHA 14
Dragon House sundial



Dragon House / Cottage, High Street, GL55 6AG

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic feature of the town. This one is set at an angle to show more hours of the day. It was used to set the town hall clock. Dated 1690.

NDHA 15
Sundial House sundial



Sundial House, High Street, GL55 6AG

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic feature of the town. This one has a vertical dial dated 1647.

NDHA 16
Cotswold House sundial



Cotswold House Hotel,
High Street, GL55 6AN

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic feature of the town. Richard Miles, a well-to-do local grocer built this house in 1815, but the dial is dated 1820.

NDHA 17
Dial House sundial



Dial House, High Street,
GL55 6AL

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic feature of the town. This was the home and shop of the Warner family 200 years ago. They made and mended clocks, watches and sundials. This dial would have been used to set these timepieces.

NDHA 18
Green Dragons sundial



Green Dragons,
High Street, GL55 6AL

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic/architectural feature of the town. This one has a curl at the end of the gnomon, and the hours and figures are, unusually, in relief.

NDHA 19
Crosby sundial



Crosby House,
High Street, GL55 6AL

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic/architectural feature of the town. This one is dated 1691.

NDHA 20
Sign of the Swan Inn



Maylams,
High Street, GL55 6AG

Old Pub Sign

This attractive sign once advertised the Swan Inn, located here from at least the mid 19th century, but now the building is a delicatessen. Campden has many interesting street signs, and this one is of historical and aesthetic value.

NDHA 21
Sign of the Lygon Arms



Lygon Arms Hotel,
High Street, GL55 6HB

Old Pub Sign

The Lygon Arms is the oldest coaching inn in Campden, trading continuously since the 15th century. This sign is an historic local landmark.

NDHA 22
Sign outside Elsley House



Elsley House,
High Street, GL55 6HA

Old sign designed by F L Griggs

This sign was originally designed for Keely's hardware shop by FL Griggs, associated with the Arts & Crafts movement, who moved to Campden in 1903. He was regarded as the finest etcher in the country. The sign is historically important.

NDHA 23
Boot-scraper Kings Hotel



Kings Hotel,
High Street, GL55 6AW

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 24
Boot-scraper Baptist Church



Baptist Church,
Lower High Street, GL55 6AL

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 25
Boot-scraper The Martins



The Martins,
High Street, GL55 6AG

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 26
Boot-scraper Trinder House



Trinder House,
High Street, GL55 6AG

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 27
Boot-scraper Westcote House



Westcote House,
High Street, GL55 6AG

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 28
Boot-scraper Ivy House



Ivy House,
High Street, GL55 6AG

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 29
Boot-scraper Woolstaplers



Woolstaplers Hall,
High Street, GL55 6HB

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 30
Boot-scraper Dovers House



Dovers House,
High Street, GL55 6HB

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 31
Boot-scraper The Bantam



Bantam Tearooms,
High Street, GL55 6HB

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

Appendix 6. Local Nature Recovery Areas

1. River Cam corridor

Improvement focus

- Riparian habitat
- Grassland
- Woodland
- Scheduled Monument
- Traditional orchard



2. River Cam and Campden Wood

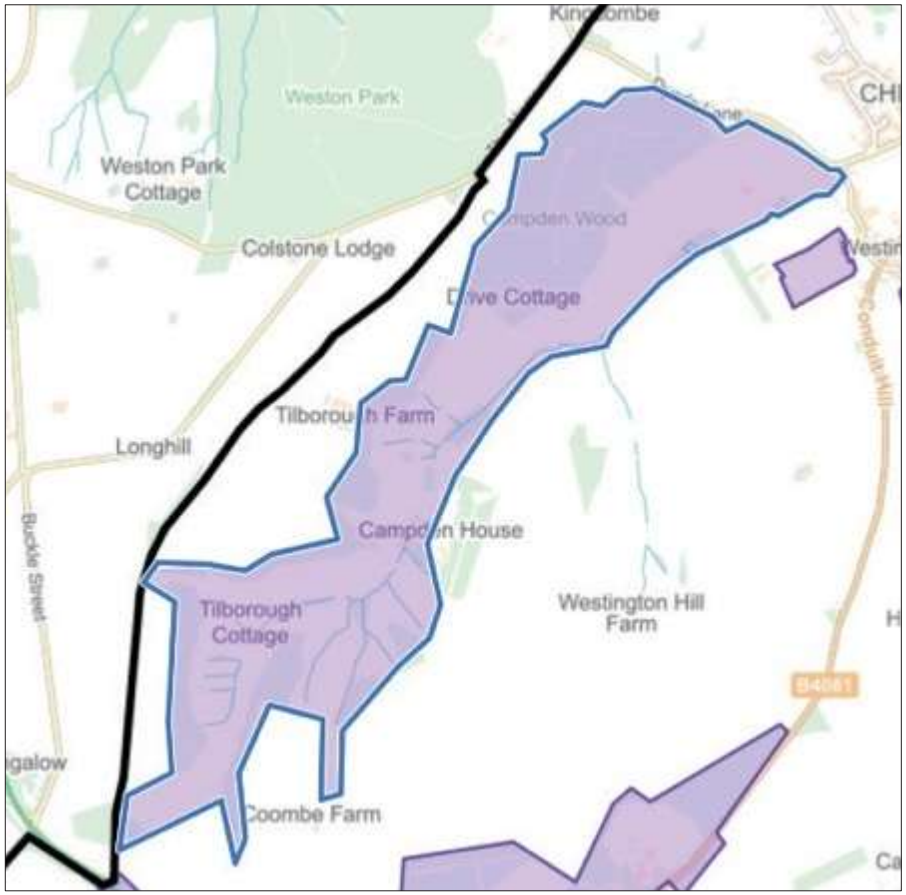
Improvement focus

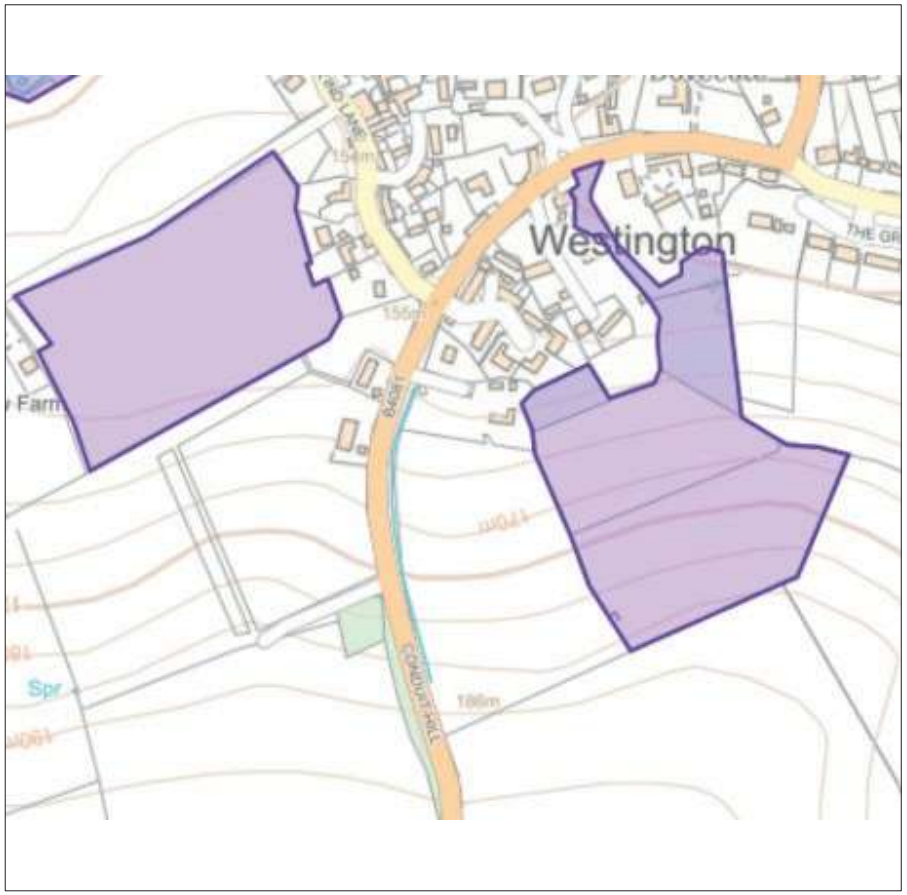
- Riparian habitat
- Woodland

3. West Chipping Campden, Leasows Farm, Westington

Improvement focus

- Former traditional orchard


Weston Park
Weston Park Cottage
Colstone Lodge
Longhill
Tilborough Cottage
Westington Hill Farm
Coombe Farm
B4081


Westington

4. Dounor House

Improvement focus

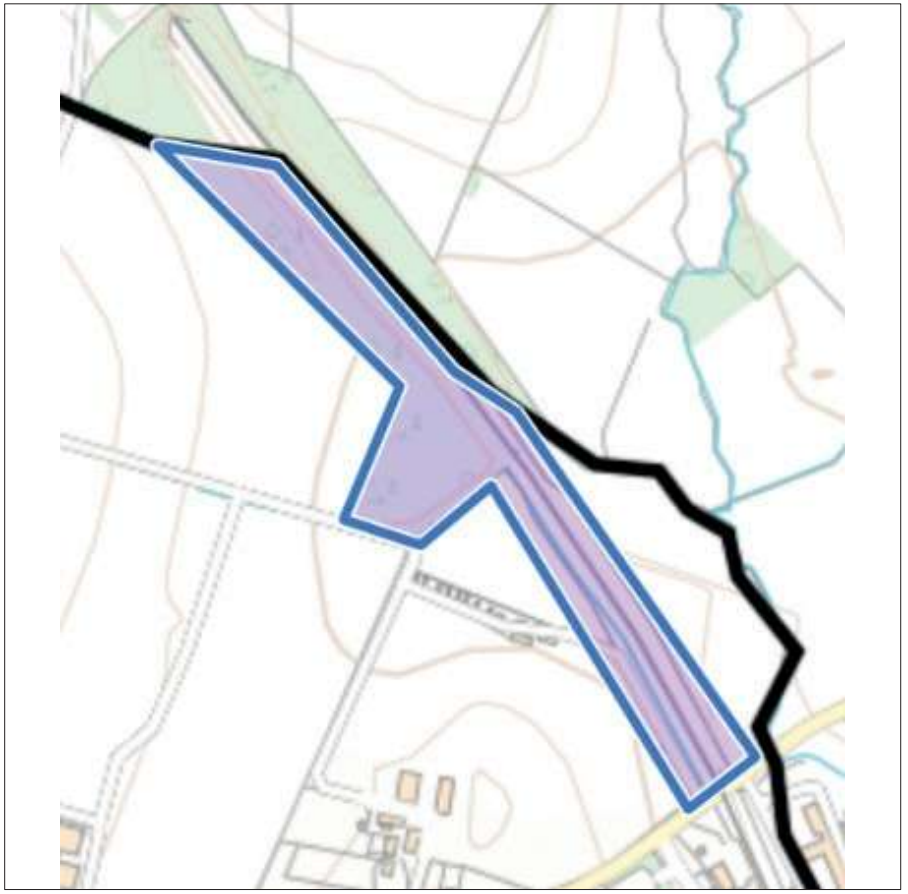
- Traditional orchard



5. Mickleton woodland

Improvement focus

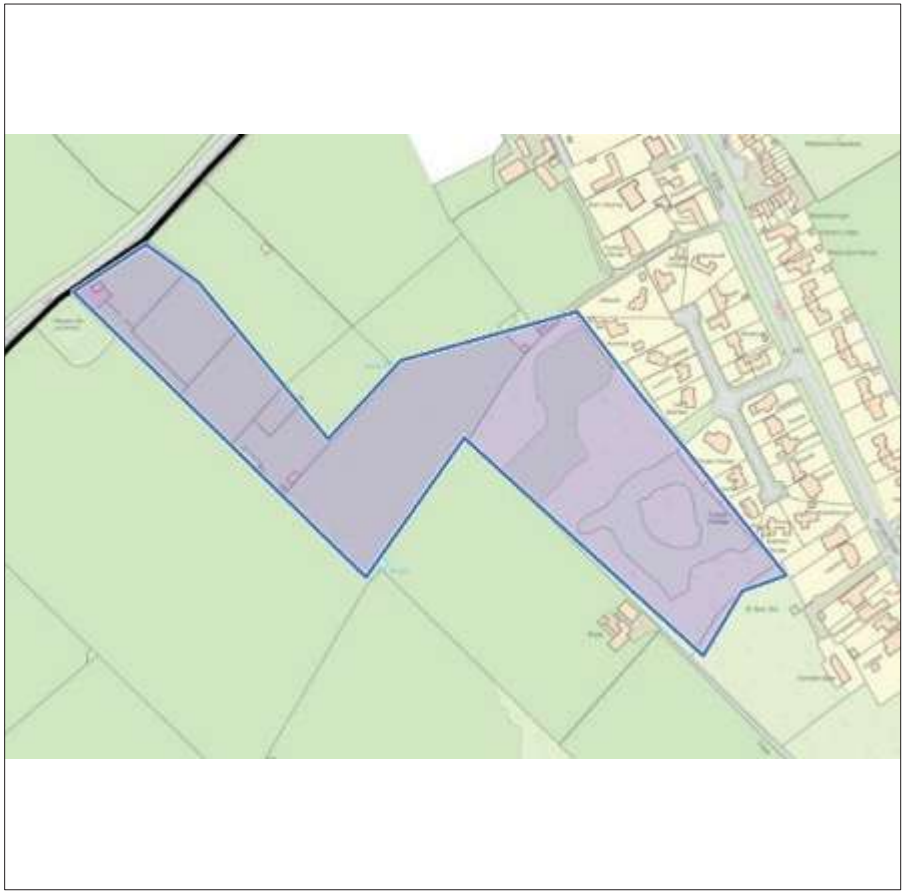
- Woodland
- Riparian habitat



6. Kingcombe Lane

Improvement focus

- Traditional orchard
- Woodland



7. Hillsdown Farm

Improvement focus

- Traditional orchard



8. Broad Campden south

Improvement focus

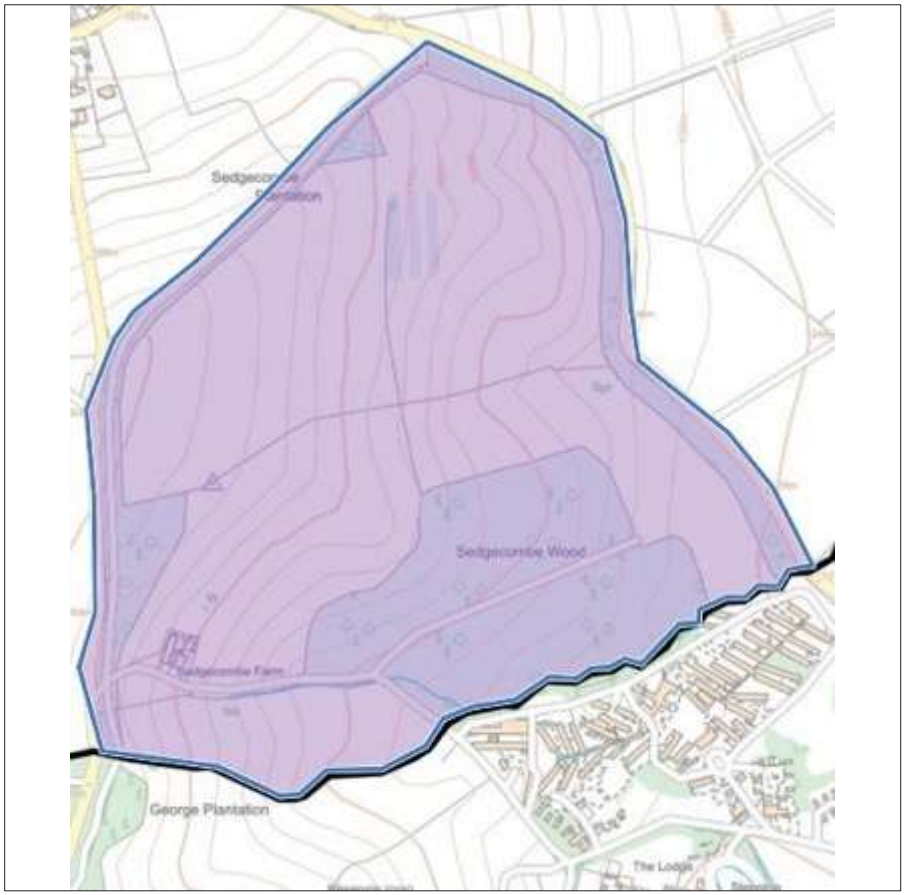
- Riparian corridor
- Traditional orchard

9. Sedgecombe

Improvement focus

- Woodland
- Wildlife corridor (verges)


Track
Track


Sedgecombe Wood
George Plantation
The Lodge

10. Hollybush Farm

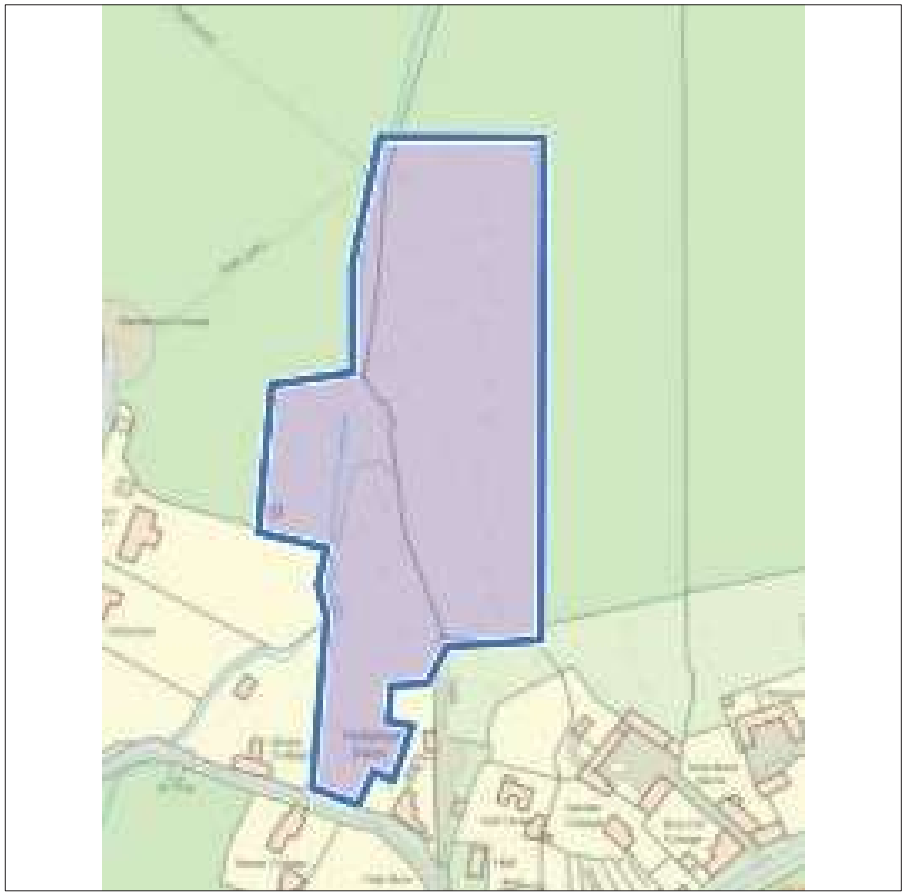
Improvement focus

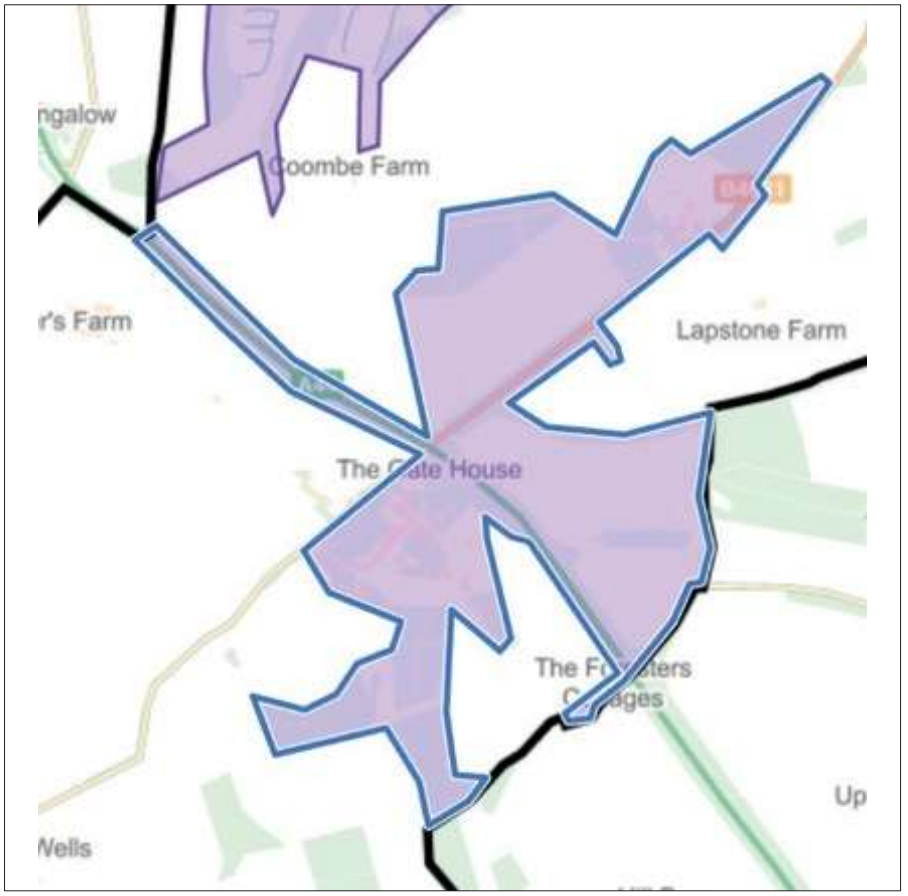
- Woodland
- Riparian corridor

11. The Gate House/ B4081/ Westington Quarry

Improvement focus

- Opportunities to enhance wildlife corridors and connectivity
- Woodlands




ngalow
Coombe Farm
r's Farm
Lapstone Farm
The Gate House
Up
Wells

12. Hare Park Plantation

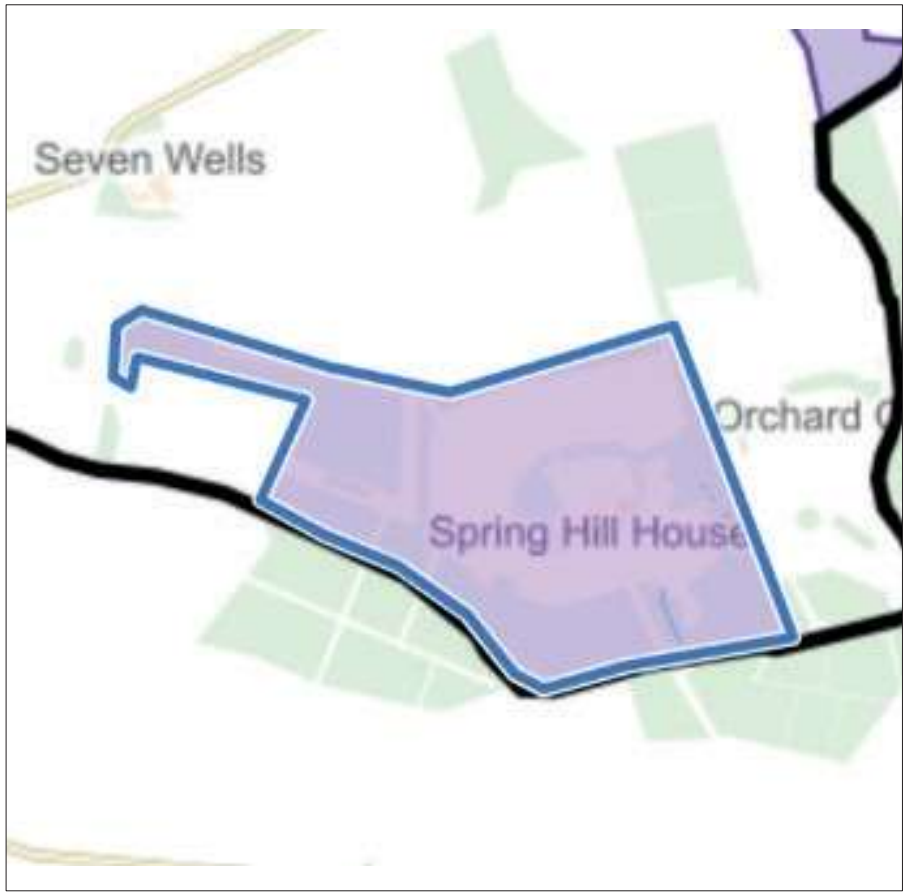
Improvement focus

- Opportunities to enhance wildlife corridors and connectivity
- Woodlands

13. Sally Beds

Improvement focus

- Woodland
- Riparian habitat


Seven Wells
Spring Hill House


Peter's
ower Barn
Farm
ill House

Appendix 7. Local Green Spaces

Local Green Space 1. Berrington Road

Berrington Road, Chipping Campden, GL55 6JA

This reasonably-sized circular area of land at the end of this quiet cul-de-sac is the only area of grass of sufficient size for children to play at this end of the town. It is of high recreational value for the local inhabitants, who have free access at all times. Use of this space provides for improved health for the local population.

Landowner:
Has the landowner already been consulted yes/no: No







Local Green Space 2. Leysbourne

Leysbourne, South side, from Church Street to Cidermill Lane, GL55 6HL

This strip of grass, freely accessible to the public, is an important part of the attractive nature of Leysbourne, leading on to the High Street, and has benches for residents and visitors to sit and admire the impressive street views. The appearance of these streets is very special, and one of the reasons why the town is much visited by tourists.

Landowner: Highways Authority
Has the landowner already been consulted yes/no: No







Local Green Space 3. High Street

High Street, North side, from Leysbourne to the Market Square, GL55 6AG

This strip of grass, freely accessible to the public, is an important part of the attractive nature of the High Street and has benches for residents and visitors to sit and admire the impressive street views. The appearance of these streets is very special, and one of the reasons why the town is much visited by tourists.

Landowner: Highways Authority
Has the landowner already been consulted yes/no: No





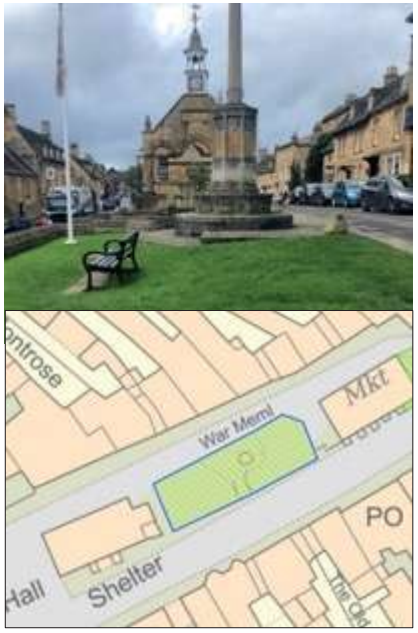


Local Green Space 4. Memorial Green

Memorial Green, High Street, Chipping Campden, GL55 6AG

This area, which contains the memorials to residents of the parish who lost their lives in the First and Second World Wars, is an important area historically and visually. It is freely accessible and provides a rest area for residents and visitors in this very central area of town between the market hall and the town hall.

Landowner: Chipping Campden Town Trust, registered Charity 203889
Has the landowner already been consulted yes/no: No



Local Green Space 5. Castle Gardens Play Area

Castle Gardens, Chipping Campden, GL55 6JR

This grassy area at the end of Castle Gardens is used as a play area for children resident at this end of the town. It has been furnished with a number of play facilities such as swings see-saws etc. and with benches for parents/carers to rest. It is an important recreational area which enriches the lives of the local residents.

Landowner: Chipping Campden Town Council
Has the landowner already been consulted yes/no: No







Local Green Space 6. Olimpick Drive Play Area

Olimpick Drive, Chipping Campden, GL55 6BL

This relatively new grassy area is used as a play area for children resident at this end of the town. It has been furnished with a number of play apparatus such as slides, see-saws etc. It is an important recreational area which enriches the lives of the local residents.

Landowner: Developers – Lagan Homes
Has the landowner already been consulted yes/no: No







Local Green Space 7. Littleworth

Grass area junction of Littleworth with Park Road, GL55 6BG

This grassy area at the junction of Littleworth with Park Road is an important part of the attractiveness of this part of the town.

Landowner: Highways Authority
Has the landowner already been consulted yes/no: No





Local Green Space 8. Westington

Land beside Woodroff House, Chipping Campden, GL55 6EG

This grassy area at the junction of Westington and Izod's Close is an important part of the attractiveness of this part of the town and provides seating for pedestrians to rest and admire the very attractive surroundings.

Landowner: Highways Authority
Has the landowner already been consulted yes/no: No





Local Green Space 9. The Mound, Broad Campden

Angel Lane, Broad Campden

This grassy area at the bottom of Angel Lane, opposite Broad Campden Church contributes to the beauty of Broad Campden. It has seating for pedestrians to rest and admire the very attractive surrounding buildings.

Landowner: Chipping Campden Town Council
Has the landowner already been consulted yes/no: No





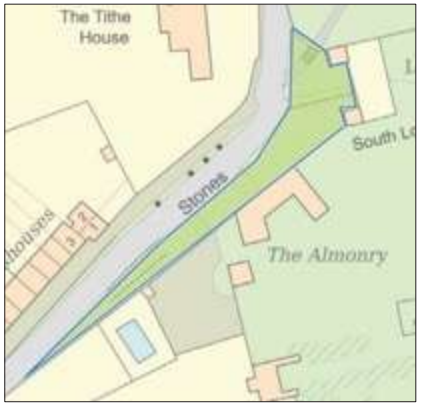
Local Green Space 10. Court Barn / Cart wash

Court Barn, Church Street, Chipping Campden GL55 6JE

This grassy area which runs from the entrance of Old Campden House, past Court Barn Museum, to the old cart wash, opposite the Almshouses, is an important part of this very beautiful part of the town, arguably one of the most picturesque areas in Chipping Campden. It is also one of the most historically important parts of the town, lying between the church, the entrance to Old Campden House, the cart-wash and the old almshouses.

Landowner: Highways Authority
Has the landowner already been consulted yes/no: No





Local Green Space 11. Recreation Ground

George Lane, Chipping Campden GL55 6DA

The Recreation Ground provides a free to use large open space for children and residents to participate in outdoor recreation and sporting events. It is also used for parish events, such as the annual Fireworks display. It has an extensive landscaped play area with well- maintained play apparatus. The “Rec” is an important area for the town, for health reasons and as a social facility.

Landowner: Chipping Campden Town Council
Has the landowner already been consulted yes/no: No







Local Green Space 12. Bowling Green

Chipping Campden Bowls, Station Road, Chipping Campden, Glos GL55 6LB

Chipping Campden Bowling Club is on the edge of the town adjacent to the Cricket Club and the housing at Castle Nurseries, 10-15 minutes' walk from the town centre. It is the visible edge of the town when approaching the east side of town along Station Road.

The bowls club (established in 1910) was previously located behind The Noel Arms in the centre of town, but this area was redeveloped many years ago. The current green and clubhouse was built due to the drive and efforts and financial support of the local community which holds the Club in high regard.

The bowling club green is one of the best in the area and the recently built clubhouse offers excellent facilities to bowling and social members in addition to visiting bowlers, spectators and guests.

The club offers year-round bowling with indoor carpet bowls being offered in the clubhouse during winter months.

The club has an inclusive membership policy and is a vital recreational facility in the town.

The clubhouse is also a social hub for residents of the town with events such as quiz and bingo nights and caters for a wide range of functions and parties.
The Club lies within the Cotswolds National Landscape.

Landowner: Chipping Campden Bowling Club
Has the landowner already been consulted yes/no:





Local Green Space 13. The Cricket Ground

Chipping Campden Cricket Club, Station Road, Chipping Campden, Glos GL55 6LB

Chipping Campden Cricket Club is on the edge of the town adjacent to the Bowling Club and the housing at Castle Nurseries, 10-15 minutes' walk from the town centre. It is the visible edge of the town when approaching from Ebrington and the Campden Business Park.

The site is 2.1 ha and lies within the Cotswolds National Landscape.

The Cricket Club was formed over 150 years ago and moved to its current site in 1972, on land that was formerly allotments as long ago as 1830. The Club built itself a new pavilion in 2022 to serve its growing membership – now over 150 juniors (who play in the CHL league) and 47 adults who play in 2 men's senior team in the Gloucestershire leagues and a lady's team who compete in tournaments during the season. The state-of-the-art facilities resulted in Chipping Campden Cricket Club being selected for the Over 60's England trials and subsequently one of 6 grounds in The Grey Ashes Series in the summer of 2023. These facilities are available for community hire.

The Cricket Club is a thriving, inclusive community club providing excellent facilities that enhance the fitness and wellbeing of the residents of the town and the enjoyment of spectators.

Landowner: Trustees of Chipping Campden Cricket Club
Has the landowner already been consulted yes/no:





Local Green Space 14. Ernest Wilson Garden

The Ernest Wilson Memorial Garden, Leysbourne, Chipping Campden, GL55 6HW

This 0.12 ha site lies within the Chipping Campden Conservation area and the Cotswolds National Landscape.

Ernest 'Chinese' Wilson (1876 - 1930) was born in Chipping Campden and became one of the great plant hunters and collectors of the early 20th Century. In 1980 the town acquired the lower part of the Old Vicarage Garden, which fronts on to the main street with the majestic tower of St James's Church to the rear. The garden was opened in 1984. 'As you walk through the gate in the high stone wall you seem to enter a secret garden, a haven of tranquility in the heart of Chipping Campden.'

This garden is enjoyed by residents and visitors alike, is open daily, and is free to visit although donations are encouraged.

Landowner: Chipping Campden Town Council
Has the landowner already been consulted yes/no:





Local Green Space 15. Wold's End Orchard

Corner Back Ends and Aston Road, Chipping Campden, Glos. GL55 6HR

The National Planning Policy Framework (2019) requires the conservation of veteran trees and their historic context. The site has a large number of veteran fruit trees, some over 150 years old thus by definition can be classed as 'ancient' given this is 'notably old for its species, some of which are rare varieties. Wolds End Orchard is Campden's last remaining traditional orchard which allows public access. It forms part of the historic environment and cultural heritage of the town and is a tribute to Campden's cider and perry making history (reference nearby Cider Mill Lane). The volunteers who maintain the site still make apple juice from its fruit. Its distinctive Broad Rigg Ridge and Furrow landscape is one of the town's last remaining examples of medieval farming methods.

The annual Wassail, a Twelfth Night tradition that has been practiced in Britain for centuries, takes place in Wolds End Orchard and has done for many years. Volunteers and visitors remark upon the feeling of tranquility of the site and how the open space and activities on offer help with feeling of positive mental health and wellbeing.

Landowner: The Campden Society (registered Charity 261665) of The Old Police Station, High Street, Chipping Campden Glos. is the beneficial owner of the site. The Land Registry registered proprietor of the site is The Official Custodian of Charities of 102 Petty France, London SW1H 9AJ on behalf of the trustees of The Campden Society.

Has the landowner already been consulted yes/no: Yes.
The Trustees and Members of the Campden Society are aware of the application to designate it as a Local Green Space and are fully supportive of this.









Local Green Space 16. Badgers Field

Badgers Field. Chipping Campden. GL55 6EU

This 0.85-hectare site is adjacent to the development at Lady Juliana's view and adjoins open farmland and has for many years been seen as a local open space.

The site is within the Cotswold National Landscape and within a 5-minute walk of the town centre.

The land is for the recreational enjoyment of the owners and all residents of the town and dog walkers.

The owners are creating half the site as a wildflower meadow and the remainder as an orchard. This is to improve biodiversity and reestablish the historical landscape of the town which has lost all but one of its heritage orchards

Landowner: Badgers Field (Chipping Campden) Management Co. Ltd. Land Registry Title GR209307
Has the landowner already been consulted yes/no: Yes.
Badgers Field (Chipping Campden) Management Co. Ltd. are fully supportive of this.

Local Green Space 17. Calf Meadow

Beyond Lady Juliana's View, Chipping Campden, GL55 6EU

This meadow provides a tranquil and well-used amenity close to the centre of the town away from roads and cars. It has various public footpaths crossing it, including the Long-Distance Heart of England Way and Diamond Way. It is part of a patchwork of three fields which make up a green walking and recreational corridor surrounding the historically and locally significant site of Old Campden House and grounds including Pool Meadow. (Scheduled Monument 1013875). The site contains a distinctive C17th vaulted stone bridge associated and listed together with Lady Juliana's Gateway (1078462) of which the field allows excellent views.

The site is adjacent to the old Town Mill, Haydon Mill, which is a C17th listed building (1078451) and one of its borders is the mill stream/ River Cam.

Landowner: Emma Defries
Has the landowner already been consulted yes/no: Yes, and no objection has been raised.






Calf Meadow

Local Green Space 18. Allotments

The Bratches, Chipping Campden GL55 6JS

The Allotments provide the opportunity for townsfolk to gain some physical exercise whilst growing their own healthy food. It is important for health and ecological reasons.

Landowner: Gloucestershire County Council
Has the landowner already been consulted yes/no: No







Local Green Space 19. The Hoo West

The part of the Hoo being land bounded to the NE by the houses / gardens along Hoo Lane, to the W and SW by Dyers Lane and the houses / gardens already built to the N and NE of Dyers Lane, to the SE by the houses/gardens off the SW side of Hoo Lane and by the houses / gardens of Littleworth, and to the NW by a line extending from the top of Hoo Lane (above the chicken sheds) along the field boundaries to Dyers Lane, below the land attached to Kingcombe.

The Hoo is an essential part of the rural environment within which the Town is set, and which gives the Town its specific character. In CDC Green Infrastructure August 2017, it is commented that the setting of the town is important to the whole of its aesthetics uniquely in that the built environment remains generally hidden in the folds of the landscape. The Cotswold Way runs up Hoo Lane from the centre of the town, and public footpath runs up Hoo Lane to the E and NE of the site and overlooks the site. Other public footpaths cross the site. The site is mostly open pasture, and forms part of the circular footpath route around the town, consistent with the CDC suggestion in the Cotswold Green Infrastructure Strategy March 2021 draft. The footpaths are used for walking, running, and dog walking.

Landowner: Peter Mackenzie
Has the landowner already been consulted yes/no: Yes. A letter of objection has been received.







Local Green Space 20. The Hoo East

Land bounded to the SW by the houses / gardens along Hoo Lane, to the SE by Back Ends and the houses / gardens already built to the N of Back Ends, to the NE by Wolds End Orchard, the Cley, and houses / gardens built to the W of Aston Road, and to the NW by a line extending from the path to the N of The Cley to Hoo Lane (above the chicken sheds).

The site is a key part of the natural setting of the Town, is extensively walked (a footpath runs through it) and is part of the wildlife corridor from The Cley westwards. The Hoo provides the skyline views looking NW from most of the town and is also highly visible from approaches to the town. It is a key part of the green landscape within which the town nestles and includes ridge and furrow features which illustrate the agricultural history of the town. It is visible from National Footpaths such as the Cotswold Way and the Monarch's Way.

The Hoo is much walked by local residents and by visitors and highly valued as being a truly rural environment within a few minutes' walk of the town centre. It is a key element of the rural setting of the town which is essential to its character.

Part of Hoo (East) was identified as an Amenity Green Space in the CDC's Green Infrastructure, Open Space and Play Space Strategy Aug 2017.

Landowner: Peter Mackenzie
Has the landowner already been consulted yes/no: Yes. A letter of objection has been received.









Local Green Space 21. The Cley

Grevel Lane, Chipping Campden GL55 6HS

This area of green space is an area of natural pasture and wild woodland, the last in the area, which occupies an elevated position. It is a notable feature on the approach to the town, providing a backdrop. It is visible to the public from the Aston Road and from the well-used footpath along the northern boundary of the site, which connects the Aston Road to the Cotswold Way National Trail. DEFRA specifically categorises the site as “Priority Habitat Inventory Deciduous Woodland” with regard to biodiversity and habitats. In addition, it is in an area categorised as “Environmentally Sensitive” and is included in the “Ground Water Vulnerability Map”. The report from the Cotswold District Council Tree Officer to a meeting of the Cotswold District Council on the 20th October 2020 in support of the TPO on the site stated inter alia “Self-seeded trees grow as a result of natural regeneration, as opposed to being planted. A tree or trees that are self-seeded in such circumstances have grown naturally and are considered worthy of protection. “The land the subject of this submission is home to an extremely wide variety of wildlife including hares, rabbits, moles, fieldmice, muntjac deer, roe deer, foxes, badgers and a wide variety of birds, some of them rare species. It serves as a vital safe haven for protected species such as Pipistrellus (common pipistrelle bat.)

Landowner: Peter Mackenzie, Mackenzie-Miller Developments Ltd.
Has the landowner already been consulted yes/no: Yes, and they have sent a letter of objection









Local Green Space 22. The Craves

South of Lower High Street & Park Lane, Chipping Campden, GL55 6DY

The site is integral to the town's identity. It has been a valued green space for centuries, with three well used public footpaths and is a unique remnant of the separation of the Norman new town of Campden from the distinct and earlier settlement of Westington.

It is a sloping field and from its high point walkers can see views over the town. The sloping site is also visible from within the town and provides a green backdrop to the historic buildings, which is a special feature not seen elsewhere. The town uses it for walking and dog walking – and paddling in the River Cam.

Six Listed buildings back onto the site from the north in Park Road and Lower High Street. One Listed building The Guild House is next to the Craves to the East. Four Listed buildings are next to or adjoin the boundary to the south.

Landowner: William and Martin Haines, Castle Farm, Station Road Chipping Campden. Gloucestershire. GL55 6JD
Has the landowner already been consulted yes/no: Yes, and they have sent a letter stating their objection.














AP
Andrea Pellegram Ltd.



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Chipping Campden Parish Neighbourhood Development Plan 2023-2031

A report to Cotswold District Council on the Chipping Campden Parish Neighbourhood Development Plan

Fact-check report 12 June 2026

Andrew Ashcroft
Independent Examiner
BA (Hons) MA, DMS, MRTPI

Director – Andrew Ashcroft Planning Limited

Executive Summary

1 I was appointed by Cotswold District Council in January 2026 to carry out the independent examination of the Chipping Campden Parish Neighbourhood Development Plan.

2 The examination was undertaken by a combination of written representations and a hearing. I visited the neighbourhood area on 6 February and on 14 April 2026.

3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. It has a focus on safeguarding its built and natural environment, and designating a package of Local Green Spaces.

4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.

5 Subject to a series of recommended modifications set out in this report, I have concluded that the Chipping Campden Parish Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.

6 I recommend that the referendum area should coincide with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
XX June 2026

1 Introduction

1.1 This report sets out the findings of the independent examination of the Chipping Campden Parish Neighbourhood Development Plan 2023-2031 (the Plan).

1.2 The Plan has been submitted to Cotswold District Council (CDC) by Chipping Campden Town Council (CCTC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.

1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.

1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises because of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.

1.5 A neighbourhood plan can be narrow or broad in scope. It can include whatever range of policies it sees as appropriate to its designated neighbourhood area. It has been designed to be distinctive in general terms, and to be complementary to the development plan. The Plan has a focus on safeguarding the built and natural environment of the neighbourhood area, and designating a package of Local Green Spaces.

1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.

1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then form a part of the wider development plan and be used to determine planning applications in the neighbourhood area.

2 The Role of the Independent Examiner

2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.

2.2 I was appointed by CDC, with the consent of CCTC, to conduct the examination of the Plan and to prepare this report. I am independent of both CDC and CCTC. I do not have any interest in any land that may be affected by the Plan.

2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have 43 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have significant experience of undertaking neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:

(a) that the Plan as submitted should proceed to a referendum; or
(b) that the Plan should proceed to referendum as modified (based on my recommendations); or
(c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

2.6 In examining the Plan I am also required to check whether:

- the policies relate to the development and use of land for a designated neighbourhood plan area; and
- the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
- the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

2.7 Having addressed the matters identified in paragraph 2.6 of this report I am satisfied that each of the points have been met subject to the contents of this report.

2.8 Section 98 of the Levelling-up and Regeneration Act 2023 requires that a neighbourhood plan:

- so far as the qualifying body considers appropriate, and having regard to the subject matter of the plan, must be designed to ensure that the development and use of land in the neighbourhood area contribute to the mitigation of, and adaptation to, climate change; and
- so far as the qualifying body considers appropriate and having regard to the subject matter of the plan, must be designed to take account of any local nature recovery strategy under section 104 of the Environment Act 2021 that relates to all or part of the neighbourhood plan area.

2.9 I have addressed the matters identified in paragraph 2.8 of this report and have taken account of the information in the updated Basic Conditions Statement. I am satisfied that the submitted Plan complies with these two requirements.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan
- the Basic Conditions Statement.
- the updated Basic Conditions Statement
- the Consultation Statement.
- the Design Guide
- the CDC SEA/HRA Screening report.
- the additional information received from the participants after the hearing
- the representations made to the Plan.
- the representations made to the updated Basic Conditions Statement.
- CCTC's responses to the clarification note.
- the adopted Cotswold Local Plan (2020 to 2031).
- the Chipping Campden Site Assessments Strategic Housing and Employment Land Availability Assessment (CDC 2021).
- the National Planning Policy Framework (December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 The various documents are helpfully available on the CDC's website. Wherever possible, I will refer to the document concerned for the purposes of keeping this report as concise as possible.

3.3 I visited the neighbourhood area on 6 February 2026 and on the day of the hearing (14 April 2026). I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. The visit is covered in more detail in Section 5 of this report.

3.4 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted Plan, I concluded that there was a need for a public hearing to assess the extent to which the Plan's policies relating to the town centre and to local green spaces meet the basic conditions. The hearing was held on 14 April 2026. The hearing note is reproduced at Appendix A of this report.

3.5 The enactment of Section 99 of the Levelling-up and Regeneration Act 2023 on 25 March 2026 changed the basic conditions against which a neighbourhood plan is assessed. In order to address this matter CCTC produced an updated Basic Conditions Statement. Targeted consultation took place on the Update. Section 4 of this report addresses this matter alongside the broader responses to the Plan. Sections 2.8 and 2.9 of this report have addressed other matters in relation to the contents of a neighbourhood plan as a set out in Section 98 of the Levelling-up and Regeneration Act 2023.

4 Consultation

Consultation Process

4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.

4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012, CCTC has prepared a Consultation Statement. The Statement is proportionate to the neighbourhood area and the policies in the Plan.

4.3 The Statement sets out the various activities that were held to engage the local community during the initial stages of the plan-preparation process. They included an initial meeting in 2019, the establishment of a steering group in 2022, and the organisation of Residents (2022) and Business (2023) Surveys.

4.4 The Statement also provide details about the consultation processes that took place on the pre-submission version of the Plan (May to June 2025). They included the preparation of a flyer and the organisation of a drop-in event.

4.5 The Statement sets out how CCTC responded to the comments received on the pre-submission Plan. This helps to explain the evolution of the Plan leading up to the submitted version.

4.6 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. CDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Feedback

4.7 Consultation on the Plan was undertaken by CDC and ended on 15 August 2025. This generated representations from the following organisations:

- Network Rail;
- Gloucestershire County Council (as a landowner);
- Gloucestershire Wildlife Trust;
- Gloucestershire County Council;
- Morgan Elliot Planning;
- Campden Estate;
- Brodie Planning Associates;
- Natural England;
- Campden Society;

- Cotswold District Council;
- Historic England; and
- SF Planning.

4.8 Twenty representations were received from residents. In most cases they offered support for the proposed local green spaces.

4.9 I have taken all the comments into account in preparing this report. Where appropriate, I refer to specific representations in my commentary on the various policies in the Plan.

4.10 A separate consultation exercise was undertaken by CDC on the revised Basic Conditions Statement which ended on 8 June 2026. This generated representations from Gloucestershire County Council, and a local resident.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

5.1 The neighbourhood area is the parish of Chipping Campden. In 2021 its population was 2377 persons. It was designated as a neighbourhood area on 14 February 2014.

5.2 The neighbourhood area lies within the Cotswold National Landscape. As Pevsner's Buildings of England describes, Chipping Campden is one of the most beautiful of smaller English country towns. Its gently curving High Street, lined with fine C17 and C18 houses, intermittingly punctuated with grass and trees, and widening in the centre to encompass Market Place and Square, is the picture of Cotswold charm. The other settlement in the neighbourhood area is Broad Campden. Whilst much smaller than Chipping Campden, it is equally attractive. The remainder of the neighbourhood area is attractive countryside primarily in agricultural use.

5.3 The built environment of the neighbourhood area is very attractive. It contains two conservation areas (one in Chipping Campden and one in Broad Campden). In addition, the parish has five Grade I, twenty-two Grade II* and 228 Grade II listed buildings. Campden House formal garden and associated medieval cultivation earthwork is a scheduled monument.

Development Plan Context

5.4 The development plan covering the neighbourhood area is the Cotswold District Local Plan (2011 to 2031). It sets out a vision, objectives, a spatial strategy, and overarching planning policies that guide new development in the Plan period. The Local Plan was adopted in August 2018.

5.5 Chipping Campden is identified as one of a series of Principal Settlements in Policy DS1 of the Local Plan. The supporting text advises that the Principal Settlements were identified as the most sustainable locations to deliver future growth, with Cirencester being the district's main centre by a very considerable margin. It also advises that the settlements were selected based on their social and economic sustainability, including accessibility to services and facilities. The availability of suitable land capable of delivering sustainable development during the Plan period also helped determine which settlements to include in the Development Strategy. Policy S16 sets out a specific development strategy for Chipping Campden

5.6 The Local Plan includes a series of other policies which affect the neighbourhood area as follows:

- Policy DS2 Development within Settlement Boundaries;
- Policy EC8 Main Town Centre Uses;
- Policy EN3 Local Green Spaces;
- Policy EN5 Cotswold Area of Outstanding Natural Beauty;
- Policy EN10 Designated Heritage Assets
- Policy EN11 Conservation Areas
- Policy EN12 Non-designated Heritage Assets

5.7 CDC is well-advanced with the preparation of a new Local Plan that will cover the period up to 2043. The most recent version of the Local Development Scheme indicates that the Plan will be submitted for its own examination in Winter 2026 and be adopted in Winter 2027.

5.8 The submitted Plan has been prepared within its wider adopted development plan context. In doing so it has relied on up-to-date information and research that has underpinned existing planning policy documents in the district. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

Visit to the Neighbourhood Area

5.8 I visited the neighbourhood area on 6 February 2026. I approached it from the Fosse Way to the east. This helped me to understand its connection to the strategic road network and its setting in the wider countryside.

5.9 On the way into the town I looked at the industrial and commercial uses around Station Road including Campden BRI and the industrial units off Battlebrook Drive.

5.10 I looked initially at the historic core of the village based around High Street. I saw the vibrancy of its retail and commercial premises. I also saw the significance of the various designated and non-designated assets in this part of the village.

5.11 I then looked at St James Church and Church. I appreciated its historic setting and its relationship to Old Campden House.

5.12 I then looked at the various proposed local green spaces within the town, and on its edges.

5.13 I then drove to Broad Campden. I saw that it had a very different character to that of Chipping Campden.

5.14 I took the opportunity to look again at the town centre on the day of the hearing. I visited the proposed local green space at The Cley (LGS21) on that day.

6 The Neighbourhood Plan as a whole

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The Basic Conditions Statement and its Update have helped considerably in the preparation of this section of the report. They are well-presented and informative documents which are proportionate to the Plan.

6.2 As part of this process I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- not have the effect of preventing development from taking place which is proposed in the development plan for the area of the authority;
- not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

6.3 I assess the Plan against the basic conditions under the following headings.

National Planning Policies and Guidance

6.4 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in December 2024.

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6.5 The NPPF sets out a range of core land-use planning issues to underpin both plan-making and decision-taking. The following are particularly relevant to the Chipping Campden Parish Neighbourhood Plan:

- a plan-led system – in this case the relationship between the neighbourhood plan and the adopted Cotswold Local Plan;
- delivering a sufficient supply of homes;
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

6.7 In addition to the NPPF, I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.

6.8 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a positive vision for the future of the neighbourhood area. It seeks to safeguard the character and appearance of the neighbourhood area and comments on design matters. It also proposes the designation of a package of Local Green Spaces. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.

6.9 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This is reinforced in Planning Practice Guidance. Paragraph ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.

6.10 As submitted, the Plan does not fully accord with this range of practical issues. Many of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes a policy for the town centre (Policy 1). In the social dimension, it includes policies for community facilities (Policy 2), and for local green spaces (Policy 6). In the environmental dimension, the Plan positively seeks to protect its natural, built. and historic environment. It has specific policies on design (Policy 3), on non-designated heritage assets (Policy 4) and on biodiversity (Policy 5). This assessment overlaps with CCTC's comments on this matter in the submitted Basic Conditions Statement.

Not have the effect of preventing development from taking place which is proposed in the development plan for the area of the authority

6.12 I have already commented in detail on the development plan context in the District in paragraphs 5.4 to 5.8 of this report.

6.13 I consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the development plan. Whilst the Plan proposes a series of policies relating to its built and natural environment, it does not prevent the potential for new development to come forward to implement the ambitions of Policy S16 of the Local Plan. Similarly, the implementation of the Plan will not prevent the development of the more specialised housing as addressed in Policies H2-H5 of the Local Plan. In this broader context I am satisfied that the implementation of the Plan will not have the effect of preventing development from taking place which is proposed in the development plan.

Strategic Environmental Assessment

6.14 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.

6.15 In order to comply with this requirement CDC published a screening report in February 2024 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It advises that the Plan sets out a vision and planning policies to shape development in Chipping Campden up to 2031 and decision makers will need to consider the criteria of these policies when determining future applications in Chipping Campden. However, it advises that the Plan does not directly impact on land use through the allocation of sites for housing or other forms of development. On this basis, the screening report concludes that the submitted Plan is unlikely to have significant environmental effects and that full SEA is therefore not required.

Habitat Regulations

6.16 CDC prepared a Habitats Regulations Assessment (HRA) of the Plan at the same time. It is very thorough and comprehensive. The screening report does not identify any likely significant effects that will require Appropriate Assessment, either for the Plan alone or in combination with other plans or projects. The screening report concludes that an Appropriate Assessment is not required for the Plan as none of the policies will directly result in new built development and likely significant effects from the plan can therefore be ruled out.

6.17 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

Human Rights

6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no

evidence that has been submitted to me to suggest otherwise. In addition, there has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. Based on all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

6.19 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan Policies

7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.

7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.

7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and CCTC have spent time and energy in identifying the issues and objectives that they wish to be included in the Plan. This sits at the heart of the localism agenda.

7.4 The Plan has been designed to reflect Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans must address the development and use of land. Section 4 identifies a separate package of community aspirations.

7.5 I have addressed the policies in the order that they appear in the submitted Plan. The community aspirations are addressed thereafter.

7.6 For clarity this section of the report comments on all the policies in the Plan.

7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial sections of the Plan (Sections 1-4)

7.8 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies. The Introduction identifies the neighbourhood area (Figure 1), and specifies the Plan period. It also summarises the consultation undertaken and includes a Key Diagram.

7.9 Section 2 sets out a comprehensive vision for the Plan. It is very distinctive to the neighbourhood area and provide an overall context for the resulting policies. The Vision is that:

'A vibrant rural community, renowned for its creativity, culture, and commerce, as much as for the beauty of its buildings, agriculture, and natural surroundings. Our aim for the (Plan) is to foster a society working together to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents to promote wellbeing, and amenities for all visitors to the area. A beautiful natural and built environment within the Cotswolds National Landscape that provides safe and accessible housing for all residents where the historic legacy is preserved.'

7.10 Section 2 also comments about the six objectives of the Plan.

7.11 Section 3 helpfully sets out the nature of the parish and its current circumstances. It helps to underpin the approach taken in several of the policies.

7.12 Section 4 comments about community concerns and aspirations.

7.13 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy 1 – Chipping Campden Town Centre

7.14 This is a wide-ranging policy on Chipping Campden Town Centre. It has three key elements:

- proposing that the Key Centre Boundary is extended (and as shown in Figure 13);
- where planning control can be exerted, the change from residential and town centre uses to visitor accommodation will only be allowed where it can be demonstrated that there will be no harm to the vibrancy of the town centre; and
- proposals to provide extra parking at Chipping Campden School or elsewhere to alleviate congestion in the town centre will be supported.

7.15 The Plan advises that the current key centre boundary line cuts across the High Street just a few metres short of its junction with Leysbourne, and Church Street. CCTC believes this is not consistent with key centre main uses and functionality. As such the Plan proposes that the existing key centre boundary relating to Local Plan policy EC7 is modified to better reflect the real function of the High Street, as reflected in the geometry of the junctions and the existence of a key town centre use that is currently outside control of Policy EC8, but should be included within, given its importance to the community. The revised boundary is shown in Figure 13.

7.16 This policy was considered at the hearing. I saw the vibrancy and attractiveness of the town centre during the visit and on the day of the hearing.

7.17 The helpful supporting text highlights the range of issues faced by the town centre and with which the Town Centre has grappled in formulating the policy. I sought CCTC's comments on the following matters:

- the initial part of the policy has an unusual format that requires the reader to access an appendix in the Plan and then refer to a policy in the Local Plan.
- is there a degree of tension between the first and third parts of the policy about visitor accommodation as the former seeks to ensure its retention whereas the latter is much less positive about such uses?
- in the third part of the policy how does it anticipate that the CDC would assess any the impact of such proposals on the vibrancy of the town centre?

7.18 I have considered these matters carefully alongside CCTC's response to the clarification note. Based on the helpful discussion at the hearing, I recommend that the policy is recast so that it delivers an update local dimension to Policy EC8 of the adopted Local Plan. In summary the recommended modified policy:

- reflects the changes in the Use Classes Order since the Local Plan was adopted;
- acknowledges the Town Council's approach towards rounding off the key centre boundary;
- is intended to supplement Policy EC8 of the Local Plan in the period leading up to the adoption of the emerging Local Plan;
- retains the support for extra car parking; and
- deletes any commentary about visitor accommodation from the policy to acknowledge the legislative issues on this matter and the way in which visitor accommodation is now an integral part of the role and character of the town centre

7.19 The modified policy has regard to Sections 6, 7 and 8 of the NPPF. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with:

'Within the key centre boundary identified on Figure 13, Class E uses will be supported where they will complement and enhance the retailing offer of the key centre. The loss of Class E uses in the key centre will not be supported where this would adversely affect the vitality and viability of the key centre entre or harm wider town centre investment, or cause amenity issues.

Where the loss of a Class E use is proposed, evidence should be submitted to demonstrate that the property has been continually, actively and effectively marketed for at least twelve months and that the use is no longer of commercial interest.

Proposals to provide extra parking at Chipping Campden School or elsewhere to alleviate congestion in the town centre will be supported.'

Policy 2 – Community Facilities and Infrastructure

7.20 The Plan advises that Chipping Campden is fortunate to have a full range of community facilities, local health services, opportunities to meet, high quality recreation for all ages, and beautiful and tranquil open spaces within the built-up areas. Table 6 and Appendix 4 list all the social and community infrastructure in the parish as the baseline of what exists and that should be protected under Local Plan policy INF2.

7.21 The policy has two parts. The first comments that the infrastructure identified in Table 6 and Appendix 4 should be used as the basis of Local Plan Policy INF2 and EC8. The second advises that the provision of suitable land for human burial will be supported.

7.22 I saw the impressive range of community facilities in the town during the visit. The proposed connection between Table 6 and Local Plan policies is a very practicable approach, and will avoid duplication of policies.

7.23 I have noted CDC's representation on the policy and CCTC's response to the representation. Taking account of all the relevant information, I recommend that the policy makes a reference only to Policy INF2 of the Local Plan. I have reached this

conclusion for two related reasons. The first is that Policy 1 of the Plan (including my recommended modifications to that policy) already addresses the importance of retail uses to good effect. The second is that the details in Policy EC8 of the Local Plan (and which overlap with the recommended modified Policy 1) are very comprehensive and there is no need for a neighbourhood plan to restate its approach.

7.24 In this context, I recommend that the reference to the grocery stores in both Table 6 and Appendix 4 are deleted and repositioned into the supporting text in the policy.

7.25 In relation to burial plots, the Plan highlights that a recent survey (March 2024) commissioned by CCTC confirmed that there were a potential additional 44 burial plots remaining. The Plan advises that new burial land is therefore required and will become urgent in time. CCTC has not identified potential sites. On this basis the second part of the policy takes a general and permissive approach.

7.26 In general terms, I am satisfied that this part of the policy takes an appropriate approach and has regard to Section 8 of the NPPF. Nevertheless, I recommend that appropriate environmental safeguards are built into the policy to being the clarity required by the NPPF and to avoid any potential unintended consequences that may arise from its implementation in the Plan period.

7.27 I have noted the suggestions from The Campden Society about the way in which the policy could be broadened. However, an extended scope of the policy is not necessary to ensure that it meets the basic conditions. In any event matters such as bus stops and litter bins are beyond planning control

7.28 With the incorporation of the recommended modifications I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Development proposals that would affect the community infrastructure identified in Table 6 and Appendix 4 will be determined on the contents of Local Plan Policy INF2.

The development of land for human burial purposes will be supported where it safeguards the residential amenity of adjoining parcels of land.’

At the end of the section headed Objective (page 64) add:

‘Policy EC8 of the Local Plan takes a very comprehensive approach to the loss of Class A1 and other town centre related uses. On this basis grocery shops are not included in the details of Table 6 and Appendix 4. Whilst they serve a clear community purpose, they are safeguarded by a development plan policy that relates to their retail use. For clarity the community attaches a specific community benefit to the following retail uses:

- *The Co-operative*
- *Fillet and Bone*

- *The One Stop Shop*
- *Toke's*
- *Maylams'*

Delete the Shops (Groceries) heading from Table 6

Delete the Shops headings from Appendix 4

Policy 3 – Design of the Built and Natural Environment

7.29 The Plan advises that the Local Plan provides very strong control over building design for the district in general and further advice is available from the Cotswolds National Landscape Management Plan. It continues by advising neither of these important documents are specific to Chipping Campden or Broad Campden and for this reason, CCTC secured technical support to prepare the Chipping Campden Design Guide (as a supporting document to the Plan).

7.30 The Design Guide provides general advice for applicants. It provides advice on strategic design principles and on detailed design. It is an excellent example of a document of this type and brings real depth and detail to the Plan.

7.31 The policy comments that planning proposals, particularly those with Design and Access Statements, should demonstrate that they have paid regard to the Chipping Campden Design Guide and should be designed according to the Building with Nature document.

7.32 Plainly design is a key consideration in the neighbourhood area. The submitted Design Guide is very impressive and will assist the ongoing local efforts to safeguard the character and appearance of the town. The overall approach taken is a very positive approach to Section 11 of the NPPF.

7.33 I note that The Campden Society supports the policy.

7.34 In this broader context, I recommend the following modifications to the policy to bring the clarity required by the NPPF and to allow CDC to be able to apply its contents through the development management process:

- the inclusion of a proportionate element to acknowledge that minor and domestic proposals will be less affected by the principles in the Design Guide than larger proposals;
- a requirement for development proposals to respond positively to the Guide rather than simply to have regard to that document; and
- the inclusion of the missing elements within the policy (as suggested by CDC)

7.35 Otherwise the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'As appropriate to their scale, nature and location, development proposals should respond positively to the Chipping Campden Design Guide and be

designed in accordance with Natural England's Green Infrastructure Planning and Design Guide and the Building with Nature standards or equivalent.'

Policy 4 – Non-Designated Heritage Assets

7.36 Appendix 5 of the Plan provides details of the proposed non-designated heritage assets (NDHAs), and explains their local significance. It advises that some of the important features of buildings are already protected under existing legislation, national and local planning policy.

7.37 I saw the significance of the proposed NDHAs during the visit. As with Policy 2, the proposed connection between Appendix 5 and Policy EN12 of the Local Plan is a practicable way forward, and will avoid a duplication of policies.

7.38 I note that The Campden Society proposes additional non-designated heritage assets. In its response to the clarification note, CCTC advised that:

'(the) NDHA list was created following the process set out in Cotswold Local Plan Policy EN12 and associated guidance and local volunteers identified candidate assets. The Council has resolved not to make further additions during this NDP cycle because new nominations require investigation, consultation, and assessment, adding them now would require re-consultation on Policy 4, and it would jeopardise Plan delivery timescales. Further NDHA work can be taken forward after NDP adoption as part of a Local Heritage List project.'

7.39 I am satisfied that the proposed NDHAs are appropriate for the neighbourhood area and reflect the approach taken in Table 6 of the Local Plan. The approach taken has regard to Section 16 of the NPPF. In this broad context, I recommend that the opening element of the policy is modified so that it is more explicit about its relationship with Policy EN12 of the Local Plan. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the policy with:

'The Plan identifies the following features as non-designated heritage assets for the purpose of the application of Policy EN12 of the Local Plan:'

Policy 5 – Biodiversity Net Gain and Local Nature recovery

7.40 This is a wide-ranging policy. As its title suggests. it addresses both Biodiversity Net Gain (BNG) and Local Nature recovery.

7.41 The policy element on BNG is general in nature. The element on the Local Nature Recovery Strategy (LNRS) is more specific. It advises that land identified in Table 7, Figure 16 and Appendix 6 is designated as the Chipping Campden Local Nature Recovery Areas for inclusion in the Gloucestershire Local Nature Recovery Map under provisions of the Environment Act 2021.

7.42 I note the approach taken in the supporting text and the wider ambitions of CCTC to dovetail the contents of the Plan into the work being undertaken by Gloucestershire

County Council and the Gloucestershire Wildlife Trust to prepare a Local Nature Recovery Strategy (LNRS). Nevertheless, I sought commentary from CCTC about the extent to which is it appropriate and/or lawful for a neighbourhood plan to propose Local Nature Recovery Areas. In its response to the clarification note CCTC commented that:

'(it) recognises that the statutory Local Nature Recovery Strategy (LNRS) will be prepared by Gloucestershire County Council as the responsible authority. The intention is not to create statutory Local Nature Recovery Areas, but to

- *identify areas within the parish that, based on locally-held habitat evidence (Appendix 2), have potential to contribute to nature recovery*
- *ensure local ecological priorities are set out transparently*
- *guide developers when identifying appropriate off-site BNG locations consistent with national policy's 'onsite first, local offsite second' structure.*

The areas shown are aspirational, non-statutory indicators, to be considered alongside, and ultimately superseded by, the Gloucestershire LNRS when published. The Plan wording could, if necessary, be modified to make this explicitly clear, such as renaming to Areas of Potential Local Nature Recovery (or similar).

7.43 In addition, I sought CCTC's advice about the what extent have the owners of the proposed Local Nature Recovery Areas been engaged in the Plan preparation process. In its response to the clarification note, CCTC commented that:

'engagement has taken place through the Regulation 4 consultation, during which all affected landowners were contacted and invited to comment, direct correspondence with several landowners who are supportive of biodiversity improvements….Where landowners have objected, this is explicitly acknowledged, and the policy does not apply designations or constraints to land. It purely identifies opportunities.'

7.44 Criteria a-e read as process issues rather than as land use policy matters. I sought advice from CCTC about its approach to this matter and the extent to which the criteria would bring any distinctive neighbourhood area value beyond the content of existing national and local planning policies relating to biodiversity net gain. In its response to the clarification note CCTC commented that:

'the criteria in Policy 5 are intended to

- *provide a clear, locally-specific decision-making sequence for developers seeking to meet statutory BNG requirements*
- *ensure that BNG delivery aligns with both national requirements and local evidence*
- *support the NPPF expectation that strategic ecology networks and local priorities be taken into account*
- *prevent ad-hoc or poorly targeted off-site BNG contributions.*

While BNG requirements originate in national legislation, the criteria add the following locally distinctive value

- *referencing locally mapped priority habitats*
- *supporting parish-level delivery of BNG where possible*
- *preventing loss of opportunity for ecological connectivity through isolated or remote off-site solutions.*

The town council would be open to separating the first part of the policy, LNRAs (or Areas of Potential Local Nature Recovery), from the BNG part of the policy.'

7.45 I have considered these comments very carefully alongside the representation from CDC and SF Planning (on the LNRS issue). In general terms I am satisfied that the element of the policy on biodiversity net gain has regard to Section 15 of the NPPF. However, in this context I recommend the following modifications to this element of the policy to bring the clarity required by the NPPF and to allow CDC to implement it through the development management process:

- a rationalisation of the overlapping criteria;
- the removal of unnecessary supporting text from within the policy; and
- the relocation of the third part of the policy into the supporting text.

7.46 I also recommend modifications to the supporting text based on the comments from CDC and Gloucestershire County Council (GCC) (both in its initial representation and in its comments on the revised Basic Conditions Statement).

7.47 On the LNRS part of the policy I have noted CCTC's response to the clarification note on its intentions for the policy. It highlights that the responsibility for the preparation of a LNRS rests with GCC. In these circumstances I recommend that this part of the policy is deleted, and that the supporting text is consolidated. I also recommend that part of the proposed site 11 for local nature recovery is deleted as it does not have the support of the landowner.

7.48 For clarity I am satisfied that the retained element of the policy (on biodiversity net gain) refers to the Gloucestershire LNRS. It is perfectly appropriate for a neighbourhood plan to signpost developers to a policy or strategy prepared by another organisation which affects the neighbourhood area

7.49 Otherwise the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'Proposals that are required to provide biodiversity net gain should demonstrate that those requirements have been fully addressed as follows:

- **by ensuring any relevant overlap with Gloucestershire Local Nature Recovery Strategy regarding the proposal site, including its relationship with the Gloucestershire Local Nature Recovery map; and**

- **ensuring that long-term biodiversity net gains will be delivered with enduring benefits, and with long-term management arrangements where necessary.**

Wherever practicable biodiversity net gain should be delivered on the development site. Where this approach is not practicable, off-site biodiversity net gain should be delivered within the Chipping Campden Local Nature Recovery Areas as the first option or elsewhere within Chipping Campden Parish or in locations that contribute to the Gloucestershire Local Nature Recovery Strategy unless sufficient justification is provided to show that delivery needs to take place elsewhere.'

Replace the third paragraph of text on page 77 with:

'The CCNDP used supporting evidence obtained from the Gloucestershire Environmental Records Centre to map habitats (see Appendix 2). The working party identified areas of the parish which present an opportunity to function as locations for achieving nature recovery and improvement (see Figure 16 and Appendix 6). The following types of opportunity are available in the Parish:'

Replace the final paragraph of text on page 77 with:

'The CCNDP acknowledges that the County Council is responsible for preparing the Local Nature Recovery Strategy (LNRS). Within this context Figure 16 identifies areas which could be optimum locations within the parish to deliver nature recovery and improvement, because either they are already important for biodiversity in their own right, provide ecological connectivity or have good potential to increase in biodiversity value or connectivity. These are based on data provided by the Gloucestershire Environmental Records Centre. It is acknowledged that the report (published in 2017) relies on data from that time and more recent data will be available, but it is considered to remain a realistic and credible representation of nature recovery and improvement potential in the area. Planning proposals should demonstrate that landowners of sites where biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery.'

Delete the Springhill Industrial Estate from site 11 on Figure 16 and in Appendix 6

Policy 6 – Local Green Spaces

7.50 The Plan proposes the designation of a package of local green spaces (LGSs). The approach taken is underpinned by the details in Appendix 7. The combination of a map and photographs for each proposed LGS is best practice.

7.51 I have noted the strength of the community support for the proposed package of LGSs.

7.52 In terms of the information in Appendix 7 I sought CCTC's comments on the following matters:

- the sizes of LGSs 11/17/19/20/21/22

- the process that was followed to engage with the owners of proposed LGSs and how the details relate to the information contained in the Consultation Statement on this matter; and
- whether any assessment was undertaken on the extent to which the proposed LGSs are already protected by other factors/designations and the other matters set out in Planning practice guidance (ID: 37-011, 37-015, 37-017 and 37-018).

7.53 Where appropriate CCTC's responses to these matters is incorporated in this report. This report also takes account of the very detailed responses from CCTC to the representations received on the proposed LGSs.

7.54 The hearing identified that CCTC had relied on Tool Kit information as part of its consideration of the extent to which the parcels of land concerned met the various criteria for LGS designation in paragraphs 106 and 107 of the NPPF. Following the hearing CCTC shared its work on the Tool Kit assessments with the hearing participants and CDC invited comments from the other participants. Where appropriate, the information received is incorporated in this report.

The proposed LGSs

7.55 I looked carefully at the proposed LGSs during the visit. I noted their various sizes, land uses, and locations. I am satisfied that most of the proposed LGSs meet the requirements of paragraphs 106 and 107 of the NPPF. In many cases, they contribute to the attractive environment of both Chipping Campden and Broad Campden. In their different ways proposed LGSs 14 (Ernest Wilson Garden), 15 (Wold's End Orchard), and 17 (Calf Meadow) are precisely the types of green space that the authors of the NPPF would have had in mind for such designations.

7.56 Detailed objections have been made about the proposed designation of LGSs 19 (The Hoo West), 20 (The Hoo East), 21 (The Cley) and 22 (The Craves). The four proposed LGSs were considered at the hearing on 14 April 2026. I address these proposed designations in turn in the next sections of this report and assess each of the four proposed LGSs against the relevant criteria in paragraphs 106 and 107 of the NPPF and the more general issues in Planning practice guidance.

LGS19 The Hoo West

7.57 Appendix 7 of the Plan advises that this proposed LGS is an essential part of the rural environment within which the Town is set, and which gives the Town its specific character. It also comments that the CDC Green Infrastructure August 2017 identifies that the setting of the town is important to the whole of its aesthetics uniquely in that the built environment remains generally hidden in the folds of the landscape. The Cotswold Way runs up Hoo Lane from the centre of the town, and public footpath runs up Hoo Lane to the east and north east of the site and overlooks the site. Other public footpaths cross the site. The site is mostly open pasture. The footpaths are used for walking, running, and dog walking.

7.58 I saw these details first-hand during the visit to the neighbourhood area on 6 February 2026.

7.59 The agent acting for the owner of the proposed LGS comments that:

'In regard to being demonstrably special or holding particular local significance, the land identified as LGS19 forms part of the open countryside that surrounds the market town of Chipping Campden; a network of agricultural fields. This wider surrounding landscape is already protected for its scenic beauty through designation as a Natural Landscape (the Cotswolds National Landscape) (formerly AONB). The settlement of Chipping Campden and surrounding countryside is washed over by this national designation. The importance of this land as local green space has been overstated in my opinion in an attempt to block areas considered under threat from future development. This restrictive (rather than positive) planning strategy is wholly inappropriate and contrary to local strategic policies for growth and national planning policy.'

7.60 I am satisfied that this proposed LGS is in reasonably close proximity to the community it serves. It is immediately adjacent to the town

7.61 I am also satisfied that the proposed LGS is demonstrably special to a local community and holds a particular local significance. It plays an important role in the setting of the town and is attractive countryside.

7.62 The proposed LGS is 15.3 hectares in size. Based on all the evidence and my own observations, I am not satisfied that it is local in character. Whilst Planning practice guidance does not identify any specific maximum size threshold for a LGS I have concluded that the proposed LGS is an extensive tract of land. This reinforces its location in the countryside surrounding the town.

7.63 I have carefully considered the extent to which the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape. Based on all the evidence I am not satisfied that this is the case. It is an integral part of the landscape which surrounds the town and enjoys the protection afforded by national policy for National Landscapes.

7.64 In all the circumstances I recommend the deletion of the proposed LGS. Whilst it meets several of the criteria for LGS designation I am not satisfied that it is local in character. Furthermore, I am not satisfied that its designation would bring additional local benefit to the location of the site in the Cotswold National Landscape.

LGS20 The Hoo East

7.65 Appendix 7 of the Plan advises that this proposed LGS is a key part of the natural setting of the Town, is extensively walked (a footpath runs through it) and is part of the wildlife corridor from The Cley westwards. It also comments that The Hoo provides the skyline views looking north-west from most of the town and is also highly visible from approaches to the town. It is a key part of the green landscape within which the town nestles and includes ridge and furrow features which illustrate the agricultural history of the town. It is visible from National Footpaths such as the Cotswold Way and the Monarch's Way.

7.66 I saw these details first-hand during the visit to the neighbourhood area on 6 February 2026.

7.67 The Agent acting for the owner of the proposed LGSs comments that:

'At the Regulation 14 stage, our client submitted clear, evidence-based objections to these designations. These concerns were acknowledged by the Neighbourhood Plan Group's own consultant, who described the evidence as "compelling" and recommended the removal of the sites. It's also suggested that the Local Planning Authority objected to LGS20 on the basis that it constitutes an extensive tract of land, contrary to the NPPF.

Despite this, the sites have not been removed. Instead, the Neighbourhood Plan continues to rely on inaccurate landownership data, insufficient evidence, and unsubstantiated claims of community value. No meaningful effort has been made to address the issues raised—either with the landowner or the Local Planning Authority—nor has there been compliance with the procedural expectation of genuine stakeholder engagement.

In planning terms, both sites fail to meet the tests for Local Green Space designation set out in Paragraphs 105 107 of the NPPF. The designation appears to serve no clear purpose beyond restricting future development, contrary to the requirement that such designations support sustainable development and complement investment in homes, jobs, and services (Paragraph 106 of the NPPF).

Given these factors and the absence of any demonstrable local significance for these sites, their continued inclusion as Local Green Spaces is not justified and would result in an unsound approach to Local Green Space Policy that would not stand up to scrutiny over the course of the current development plan period.'

7.68 I am satisfied that this proposed LGS is in reasonably close proximity to the community it serves. It is immediately adjacent to the town. Its accessibility is reinforced by the well-used footpaths throughout its area.

7.69 I am also satisfied that the proposed LGS is demonstrably special to a local community and holds a particular local significance. It plays an important role in the setting of the town and is attractive countryside.

7.70 The proposed LGS is 17.8 hectares in size. Whilst Planning practice guidance does not identify any specific maximum size threshold for a LGS I have concluded that the proposed LGS is an extensive tract of land. This reinforces its location in the countryside surrounding the town.

7.71 I have carefully considered the extent to which the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape. Based on all the evidence I am not satisfied that this is the case. It is an integral part of the landscape which surrounds the town and enjoys the protection afforded by national policy for National Landscapes.

7.72 In all the circumstances I recommend the deletion of the proposed LGS. Whilst it meets several of the criteria for LGS designation I am not satisfied that it is local in character. Furthermore, I am not satisfied that its designation would bring additional local benefit to the location of the site in the Cotswold National Landscape.

LGS 21 The Cley

7.73 Appendix 7 of the Plan advises that this proposed LGS is an area of natural pasture and wild woodland, the last in the area, which occupies an elevated position. It is a notable feature on the approach to the town, providing a backdrop. It is visible to the public from the Aston Road and from the well-used footpath along the northern boundary of the site, which connects the Aston Road to the Cotswold Way National Trail. It also advises that the land is home to an extremely wide variety of wildlife including hares, rabbits, moles, fieldmice, muntjac deer, roe deer, foxes, badgers and a wide variety of birds, some of them rare species.

7.74 I saw these details from the footpaths surrounding the site during the visit to the neighbourhood area on 6 February 2026.

7.75 An unaccompanied visit into the site was arranged for me during the hearing that took place on 14 April 2026.

7.76 I am satisfied that this proposed LGS is in reasonably close proximity to the community it serves. It is immediately adjacent to the built form of the town.

7.77 Appendix 7 comments generally on the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance. CCTC submitted its toolkit analysis after the hearing. On this issue it comments as follows:

'*The character of Chipping Campden is to a large extent defined by its history, evidenced for instance by historic buildings and sites such as Old Campden House and Gardens, and its rural setting which tells the story and provides a physical link with its agricultural past. Sites such as the Cley are essential elements of the rural setting. The Cley is the last surviving unspoilt woodland in the town; it is also the last piece in the jigsaw of the circular paths around the town, being a green strip adjoining the footpath leading down from the Hoo to Aston Road. DEFRA specifically categorises the site as Priority Habitat Inventory Deciduous Woodland with regard to biodiversity and habitats. In addition, it is in an area categorised as Environmentally Sensitive and is included in the Ground Water Vulnerability Map,'*

7.78 Following the hearing, the agent acting for the owner of the site provided a package of information about the work it is undertaking on a Woodland Management Plan for the site and which is being pursued with the Forestry Commission as follows:

'*The Woodland Management Plan identifies widespread woodland degradation, including significant Ash Dieback, unmanaged scrub growth, declining tree health, structural instability, and risks associated with trees adjoining residential property and third-party land. Importantly, substantial felling operations have been recommended*

across the majority of the woodland compartments as part of good and necessary woodland management.

The evidence base supporting LGS21 places substantial reliance upon:

- *the quality and amenity value of the woodland;*
- *the ecological significance of the site;*
- *the contribution of the tree stock to the setting of the town.*

However, the professional woodland management evidence now before the Examiner demonstrates that:

- *large parts of the woodland are in declining condition;*
- *substantial felling is considered necessary as part of responsible woodland management;*
- *significant proportions of the existing tree stock are affected by Ash Dieback or structural decline; and*
- *active intervention is required to secure the long-term future and resilience of the woodland.*

That evidence sits uneasily alongside the suggestion within the Neighbourhood Plan evidence base that the site comprises a uniformly high-quality woodland resource of exceptional local significance.

This does not diminish the value of the woodland generally; however, it does demonstrate that the condition, composition, and quality of the woodland is materially more complex and dynamic than suggested within the Local Green Space assessment.'

7.79 I noted carefully the location and condition of the trees on the site during the visit in April 2026. On the balance of the evidence, I am not satisfied that CCTC has made a compelling case that the proposed LGS is demonstrably special. The Tree Preservation Order on the site is of a general nature rather than specific to individual trees. Furthermore, there is clear evidence that management of the woodland is necessary to secure its longer-term future and well-being.

7.80 The proposed LGS is 2.17 hectares in size. Based on all the evidence I am satisfied that the proposed LGS is local in character and not an extensive parcel of land. Whilst it is slightly larger than most of the other proposed LGSs within the built-up part of the town its size and character are local. Moreover, its size is considerably smaller than proposed LGS 19 and 20 which I have concluded are large tracts of land.

7.81 I have also considered carefully the way in which the proposed designation would comply with the requirements of paragraph 106 of the NPPF. I am satisfied that its designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. In the broader context of CDC's preparation of a new Local Plan I note that the site was considered as part of the Site Assessment process in 2021 (as site CC64) and was discounted as the whole of the site is covered by a Tree Preservation Order.

7.82 I have carefully considered the extent to which the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape. On the one hand, I noted that the proposed LGS has a different and more enclosed character to that of the adjacent proposed LGS 20 (The Hoo East). On the other hand, I saw from both visits that it formed part of the wider landscape beyond the built-up form of the town. On the balance of all the evidence I am not satisfied that the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape.

7.83 In all the circumstances I recommend the deletion of the proposed LGS. Whilst it meets several of the criteria for LGS designation, I am not satisfied that meets the demonstrably special element of paragraph 107 of the NPPF. Furthermore, I am not satisfied that its designation would bring additional local benefit to the location of the site in the Cotswold National Landscape.

LGS22 The Craves

7.84 Appendix 7 of the Plan advises that this proposed LGS is integral to the town's identity. It has been a valued green space for centuries, with three well used public footpaths and is a unique remnant of the separation of the Norman new town of Campden from the distinct and earlier settlement of Westington. It is a sloping field and from its high point walkers can see views over the town. The sloping site is also visible from within the town and provides a green backdrop to the historic buildings, which is a special feature not seen elsewhere. The town uses it for walking and dog walking – and paddling in the River Cam.

7.85 I saw these details first-hand during the visit to the neighbourhood area on 6 February 2026. I noted the importance of the footpaths within the site and the way in which they connected with the built-up parts of the town surrounding the proposed LGS.

7.86 The agent acting for the owner of the proposed LGS comments that:

'Contrary to the views expressed in the LGS assessment (Appendix 6, Reg 15 version CCNDP), draft designation LGS22 does not meet the criteria set out under Paragraph 107. As such, the designation of this land as LGS would be contrary to national planning policy.

It is accepted that a footpath crosses the field (Footpath 15) and there are two headland footpaths that run partially along the northern (Footpath 14) and southern (Footpath 16) boundaries, but this is not reason enough for this land to be of particular importance or demonstrably special. The NPPG is clear that "Areas that may be considered for designation as Local Green Space may be crossed by public rights of way. There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation." (Paragraph: 018 Reference ID: 37-018-20140306: Revision date: 06 03 2014).

In addition, the NPPG states "There are no hard and fast rules about how big a Local Green Space can be because places are different, and a degree of judgment will inevitably be needed. The total area of the field known as the Craves amounts to 7 acres. When considered against the immediate local context this amounts to an area

of considerable size, a large area or extensive tract of land which would fail to comply with the designation criteria set out in Paragraph 107 of the NPPF. Although this land lies within the form of the settlement and not adjacent to the settlement where a LGS designation might be likened to a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.' [Paragraph: 015 Reference ID: 37 015-20140306; Revision date: 06 03 2014]. Equally, a blanket designation of the land known as the Craves would not be consistent with or appropriate as a 'back door' approach to protect this land from future development or as a strategic gap by any other name.'

7.87 I have carefully considered this proposed LGS. It is an unusual LGS to the extent that it is a parcel of agricultural land within the built-up part of the town. Nevertheless, national legislation is clear that LGSs can come forward in a variety of circumstances.

7.88 I am satisfied that this proposed LGS is in reasonably close proximity to the community it serves. Indeed, it is set within the built-up part of the town. Its accessibility is reinforced by the well-used footpaths throughout its area.

7.89 I am satisfied that the proposed LGS is demonstrably special to a local community and holds a particular local significance. As the Plan comments it has been a valued green space for centuries, with three well used public footpaths and is a unique remnant of the separation of the Norman new town of Campden from the distinct and earlier settlement of Westington. It also provides a green backdrop to the historic buildings, which is a special feature not seen elsewhere.

7.90 The proposed LGS is 3.21 hectares in size. Based on all the evidence, I am satisfied that the proposed LGS is local in character and not an extensive parcel of land. Whilst it is slightly larger than most of the other proposed LGSs within the built-up part of the town, its size and character are local. Moreover, its size is considerably smaller than LGS 19 and 20 which I have concluded are large tracts of land.

7.91 I have also considered carefully the way in which the proposed designation would comply with the requirements of paragraph 106 of the NPPF. I am satisfied that its designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. In the broader context of CDC's preparation of a new Local Plan I note that the site was considered as part of the Site Assessment process in 2021 (as site CC58) and was discounted for the following reasons:

'Unsuitable for housing or commercial development – this is a highly sensitive site within the Conservation Area and the AONB. The site also forms part of the setting of a large number of Grade II Listed Buildings and is a green lung within the town. Flood Zones 3b, 3a and 2 (SFRA Level 2) extend within the northern boundary. A Public Right of Way also runs through centre of site and along northern and southern boundaries. The access onto Blind Lane is also likely to be problematic.'

7.92 I am also satisfied that the proposed LGS is capable of enduring beyond the end of the Plan period and there is no evidence to suggest otherwise.

7.93 I have carefully considered the extent to which the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape. Based on all the evidence, I am satisfied that this is the case. LGS designation would identify the special characteristics of the site, including the way in which it provides a setting for several heritage assets and includes well-used footpaths.

7.94 In conclusion I am satisfied that the proposed LGS meets the basic conditions.

The Policy Wording

7.95 The policy takes a simple format and merely lists the proposed LGSs. The information in the box in the supporting text draws attention to national policy on this matter in the NPPF. Whilst the implication of LGS designation may be clear to planning professionals, it is not set out in the policy. I recommend a modification to address this matter.

7.96 With this modification to the policy wording and the deletion of the three LGSs I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Delete proposed LGSs 19, 20 and 21 from the list in the policy.

Add as a separate element at the end of the policy 'Development proposals within the designated local green spaces will only be supported in very special circumstances.'

Remove proposed LGSs 19, 20 and 21 from Figure 17

Community Aspirations

7.97 Section 4 of the Plan identifies the following community aspirations:

- Better town centre parking;
- Railway Station;
- Campden BRI, Campden Business Park, and start-up industries
- Replacement Primary School;
- Health Centre; and
- Indoor Sports Facility.

7.98 These matters are properly addressed in a separate part of the Plan from the land use policies. This is best practice. In addition, I am satisfied that the community aspirations are appropriate to be included in the Plan and are locally-distinctive to the neighbourhood area.

Monitoring and Review

7.99 The Plan addresses the way in which it will be monitored and review in a positive fashion. This is best practice. It comments generally about the potential significance of the adoption of the emerging Local Plan. In this context I recommend that the commentary is more specific about the way in which CCTC will respond at that time.

Replace the commentary on page 8 (under the Neighbourhood Plan period heading) with:

'The CCNDP supports policies in the Cotswold District Local Plan 2011 – 2031. The CCNDP period relates to that for the Local Plan and covers the period to 2031. Where Local Plan policies change some of the policies in this CCNDP may become out of date and a review of the NDP would be justified. In this context the Town Council will consider the need for a full or partial review of the Plan within six months of the adoption of a new Local Plan for the District.'

Other Matters - General

7.100 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. It will be appropriate for CDC and CCTC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies.

Other Matters – Specific

7.101 CDC has made detailed comments on the Plan. They have been very helpful as part of the wider examination process. Where they relate directly to specific policies, I have considered them in my assessment on a policy-by-policy basis. CDC has also made a series of more general comments on the wording used in the Plan. I recommend the following modifications to address these matters:

- Page 15 and beyond – replace 'Cotswold Area of Outstanding Natural Beauty with Cotswold National Landscape'
- Include numbers in the headings to the various sections of the Plan to correspond with the numbering in the Contents page

7.102 Some representations to the Plan proposed additional policies or site allocations. Whilst I have considered their details carefully, my role is to examine the Plan as submitted rather than to propose additional policies or a revised Plan. It is on this basis that this report has not directly addressed these representations.

8 Summary and Conclusions

Summary

8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2031. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to extend the key centre boundary, to safeguard the character of the neighbourhood area and to designate Local Green Spaces.

8.2 Following the independent examination of the Plan, I have concluded that the submitted Chipping Campden Parish Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

8.3 Based on the findings in this report I recommend to Cotswold District Council that subject to the incorporation of the modifications set out in this report the Chipping Campden Parish Neighbourhood Development Plan should proceed to referendum.

Referendum Area

8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the District Council on 14 February 2014.

8.5 I am grateful to everyone who has contributed to the examination. The Town Council's responses to the clarification note were both helpful and timely and the hearing was conducted in an open way.

Andrew Ashcroft
Independent Examiner
XX June 2026

Appendix A

Chipping Campden Parish Neighbourhood Development

Detailed Hearing Note

Context

This note clarifies the next stages of the examination process and expands on the earlier note about the need for a hearing.

The examination of the submitted Plan is proceeding well. I have visited the neighbourhood area, read the submitted documents and the representations made to the Plan. I have also prepared a clarification note and read the responses to that note.

Hearing

I am satisfied that most of the Plan can be examined by way of written representations. However, in accordance with paragraph 9(3) of Schedule 4B to the Town and Country Planning Act 1990, I have concluded that to ensure an adequate examination of the Plan it is necessary to hold a hearing on the contents of Policies 1 and 6 of the submitted Plan.

Hearing Details

The hearing details are as follows:

Date: Tuesday 14 April 2026
Time: 10.30 am
Venue: Town Hall, High Street, Chipping Campden GL55 6HB

The issues and the participants

The Issues

The hearing will address two issues.

The first is the Plan's proposal in Policy 6 to designate the following local green spaces:

- The Hoo West (LGS19);
- The Hoo East (LGS20);
- The Cley (LGS21); and
- The Craves (LGS22).

The second is the Plan's proposal in Policy 1 to extend the Chipping Campden Key Centre boundary.

The Participants

Chipping Campden Town Council (CCTC) and Cotswold District Council (CDC) have a statutory role at the hearing.

The private sector organisations listed below have been invited to attend the hearing:

- Morgan Elliot Planning (on proposed Local Green Spaces 20 and 21); and
- Brodie Planning Associates (on proposed Local Green Spaces 19 and 22).

The public and other interested parties will be able to attend the hearing. However, only the organisations invited to attend will be able to participate on the day.

There will be breaks throughout the day and with a slightly longer break at lunchtime. I anticipate that the hearing will finish around 4.30pm.

The hearing sessions

Session 1: The extent to which the Town Council has addressed the additional benefit of the relevant proposed local green space designations beyond the location of the sites concerned in the Cotswolds National Landscape.

This session will address the extent to which the proposed local green space (LGS) designations have regard to Planning practice guidance (ID: 37-011-20140306).

The participants for this session will be CCTC, CDC, Morgan Elliot Planning, and Brodie Planning Associates.

Session 2: Proposed LGS 20 The Hoo East

This session will address the following matters:

- the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance (NPPF 107b);
- the extent to which the proposed LGS is local in character and is not an extensive tract of land (NPPF 107c);
- the extent to which the proposed designation has regard to Planning practice guidance ID: 37-017-20140306 (on public access), and ID: 37-018-20140306 (on public rights of way);
- the extent to which the proposed designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services (NPPF106); and
- the extent to which the proposed designation is capable of enduring beyond the end of the Plan period (NPPF 106).

The participants for this session will be CCTC, CDC and Morgan Elliot Planning.

Session 3: Proposed LGS 21 The Cley

This session will address the following matters:

- the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance (NPPF 107b);
- the extent to which the proposed LGS is local in character and is not an extensive tract of land (NPPF 107c);
- the extent to which the proposed designation has regard to Planning practice guidance ID: 37-017-20140306 (on public access), and ID: 37-018-20140306 (on public rights of way);

- the extent to which the proposed designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services (NPPF106); and
- the extent to which the proposed designation is capable of enduring beyond the end of the Plan period (NPPF 106).

The participants for this session will be CCTC, CDC and Morgan Elliot Planning.

Session 4: Proposed LGS 19 The Hoo West

This session will address the following matters:

- the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance (NPPF 107b);
- the extent to which the proposed LGS is local in character and is not an extensive tract of land (NPPF 107c);
- the extent to which the proposed designation has regard to Planning practice guidance ID: 37-017-20140306 (on public access), and ID: 37-018-20140306 (on public rights of way);
- the extent to which the proposed designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services (NPPF106); and
- the extent to which the proposed designation is capable of enduring beyond the end of the Plan period (NPPF 106).

The participants for this session will be CCTC, CDC and Brodie Planning Associates.

Session 5: Proposed LGS The Craves

This session will address the following matters:

- the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance (NPPF 107b);
- the extent to which the proposed LGS is local in character and is not an extensive tract of land (NPPF 107c);
- the extent to which the proposed designation has regard to Planning practice guidance ID: 37-017-20140306 (on public access), and ID: 37-018-20140306 (on public rights of way);
- the extent to which the proposed designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services (NPPF106); and
- the extent to which the proposed designation is capable of enduring beyond the end of the Plan period (NPPF 106).

The participants for this session will be CCTC, CDC and Brodie Planning Associates.

Session 6: The proposed extension of the Chipping Campden Key Centre Boundary

This session will address the following matters:

- the extent to which the proposed extension of the key centre boundary is based on appropriate evidence; and

- if there is a case to extend the boundary, how should the policy be worded so that it relates to the general principles and approach set out in Policy EC8 of the adopted Cotswold District Local Plan.

The participants for this session will be CCTC and CDC.

Other Matters

The Arrangements for the Hearing

The hearing will address the matters above in turn. I will ask the various questions and lead any further discussion on the issues.

The details in the Plan and the representations made by the various parties are thorough and comprehensive. As such hearing statements are not required.

The Next Steps after the hearing

I will finalise my report on the Plan as soon as possible after the hearing. The parts of the report which are unaffected by the hearing will have been completed by 14 April.

The Examination Report

The hearing introduces an additional stage into the examination process. It does not affect the way in which the report will be produced and finalised. I will send a fact check report to the District Council and the Town Council (as set out in the note on examination arrangements). The main findings of the hearing will be incorporated within the report on a policy-by-policy basis. The final report will be published once the fact-checking process has concluded.

Andrew Ashcroft

Independent Examiner

Chipping Campden Parish NDP

13 March 2026 (Examiner's Note – this is the date of the hearing note, and not the date of the final report)

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Chipping Campden Parish Neighbourhood Development Plan 2023-2031

A report to Cotswold District Council on the Chipping Campden Parish Neighbourhood Development Plan

Andrew Ashcroft
Independent Examiner
BA (Hons) MA, DMS, MRTPI

Director – Andrew Ashcroft Planning Limited

Executive Summary

1 I was appointed by Cotswold District Council in January 2026 to carry out the independent examination of the Chipping Campden Parish Neighbourhood Development Plan.

2 The examination was undertaken by a combination of written representations and a hearing. I visited the neighbourhood area on 6 February and on 14 April 2026.

3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. It has a focus on safeguarding its built and natural environment, and designating a package of Local Green Spaces.

4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.

5 Subject to a series of recommended modifications set out in this report, I have concluded that the Chipping Campden Parish Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.

6 I recommend that the referendum area should coincide with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
25 June 2026

1 Introduction

1.1 This report sets out the findings of the independent examination of the Chipping Campden Parish Neighbourhood Development Plan 2023-2031 (the Plan).

1.2 The Plan has been submitted to Cotswold District Council (CDC) by Chipping Campden Town Council (CCTC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.

1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.

1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises because of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.

1.5 A neighbourhood plan can be narrow or broad in scope. It can include whatever range of policies it sees as appropriate to its designated neighbourhood area. It has been designed to be distinctive in general terms, and to be complementary to the development plan. The Plan has a focus on safeguarding the built and natural environment of the neighbourhood area, and designating a package of Local Green Spaces.

1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.

1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then form a part of the wider development plan and be used to determine planning applications in the neighbourhood area.

2 The Role of the Independent Examiner

2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.

2.2 I was appointed by CDC, with the consent of CCTC, to conduct the examination of the Plan and to prepare this report. I am independent of both CDC and CCTC. I do not have any interest in any land that may be affected by the Plan.

2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have 43 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have significant experience of undertaking neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:

(a) that the Plan as submitted should proceed to a referendum; or
(b) that the Plan should proceed to referendum as modified (based on my recommendations); or
(c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

2.6 In examining the Plan I am also required to check whether:

- the policies relate to the development and use of land for a designated neighbourhood plan area; and
- the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
- the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

2.7 Having addressed the matters identified in paragraph 2.6 of this report I am satisfied that each of the points have been met subject to the contents of this report.

2.8 Section 98 of the Levelling-up and Regeneration Act 2023 requires that a neighbourhood plan:

- so far as the qualifying body considers appropriate, and having regard to the subject matter of the plan, must be designed to ensure that the development and use of land in the neighbourhood area contribute to the mitigation of, and adaptation to, climate change; and
- so far as the qualifying body considers appropriate and having regard to the subject matter of the plan, must be designed to take account of any local nature recovery strategy under section 104 of the Environment Act 2021 that relates to all or part of the neighbourhood plan area.

2.9 I have addressed the matters identified in paragraph 2.8 of this report and have taken account of the information in the updated Basic Conditions Statement. I am satisfied that the submitted Plan complies with these two requirements.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan
- the Basic Conditions Statement.
- the updated Basic Conditions Statement
- the Consultation Statement.
- the Design Guide
- the CDC SEA/HRA Screening report.
- the additional information received from the participants after the hearing
- the representations made to the Plan.
- the representations made to the updated Basic Conditions Statement.
- CCTC's responses to the clarification note.
- the adopted Cotswold Local Plan (2020 to 2031).
- the Chipping Campden Site Assessments Strategic Housing and Employment Land Availability Assessment (CDC 2021).
- the National Planning Policy Framework (December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 The various documents are helpfully available on the CDC's website. Wherever possible, I will refer to the document concerned for the purposes of keeping this report as concise as possible.

3.3 I visited the neighbourhood area on 6 February 2026 and on the day of the hearing (14 April 2026). I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. The visit is covered in more detail in Section 5 of this report.

3.4 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted Plan, I concluded that there was a need for a public hearing to assess the extent to which the Plan's policies relating to the town centre and to local green spaces meet the basic conditions. The hearing was held on 14 April 2026. The hearing note is reproduced at Appendix A of this report.

3.5 The enactment of Section 99 of the Levelling-up and Regeneration Act 2023 on 25 March 2026 changed the basic conditions against which a neighbourhood plan is assessed. In order to address this matter CCTC produced an updated Basic Conditions Statement. Targeted consultation took place on the Update. Section 4 of this report addresses this matter alongside the broader responses to the Plan. Sections 2.8 and 2.9 of this report have addressed other matters in relation to the contents of a neighbourhood plan as a set out in Section 98 of the Levelling-up and Regeneration Act 2023.

4 Consultation

Consultation Process

4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.

4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012, CCTC has prepared a Consultation Statement. The Statement is proportionate to the neighbourhood area and the policies in the Plan.

4.3 The Statement sets out the various activities that were held to engage the local community during the initial stages of the plan-preparation process. They included an initial meeting in 2019, the establishment of a steering group in 2022, and the organisation of Residents (2022) and Business (2023) Surveys.

4.4 The Statement also provide details about the consultation processes that took place on the pre-submission version of the Plan (May to June 2025). They included the preparation of a flyer and the organisation of a drop-in event.

4.5 The Statement sets out how CCTC responded to the comments received on the pre-submission Plan. This helps to explain the evolution of the Plan leading up to the submitted version.

4.6 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. CDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Feedback

4.7 Consultation on the Plan was undertaken by CDC and ended on 15 August 2025. This generated representations from the following organisations:

- Network Rail;
- Gloucestershire County Council (as a landowner);
- Gloucestershire Wildlife Trust;
- Gloucestershire County Council;
- Morgan Elliot Planning;
- Campden Estate;
- Brodie Planning Associates;
- Natural England;
- Campden Society;

- Cotswold District Council;
- Historic England; and
- SF Planning.

4.8 Twenty representations were received from residents. In many cases they offered support for the proposed local green spaces.

4.9 I have taken all the comments into account in preparing this report. Where appropriate, I refer to specific representations in my commentary on the various policies in the Plan.

4.10 A separate consultation exercise was undertaken by CDC on the revised Basic Conditions Statement which ended on 8 June 2026. This generated representations from Gloucestershire County Council, and a local resident.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

5.1 The neighbourhood area is the parish of Chipping Campden. In 2021 its population was 2377 persons. It was designated as a neighbourhood area on 14 February 2014.

5.2 The neighbourhood area lies within the Cotswold National Landscape. As Pevsner's Buildings of England describes, 'Chipping Campden is one of the most beautiful of smaller English country towns. Its gently curving High Street, lined with fine C17 and C18 houses, intermittingly punctuated with grass and trees, and widening in the centre to encompass Market Place and Square, is the picture of Cotswold charm'. The other settlement in the neighbourhood area is Broad Campden. Whilst much smaller than Chipping Campden, it is equally attractive. The remainder of the neighbourhood area is attractive countryside primarily in agricultural use.

5.3 The built environment of the neighbourhood area is very attractive. It contains two conservation areas (one in Chipping Campden and one in Broad Campden). In addition, the parish has five Grade I, twenty-two Grade II* and 228 Grade II listed buildings. Campden House formal garden and associated medieval cultivation earthwork is a scheduled monument.

Development Plan Context

5.4 The development plan covering the neighbourhood area is the Cotswold District Local Plan (2011 to 2031). It sets out a vision, objectives, a spatial strategy, and overarching planning policies that guide new development in the Plan period. The Local Plan was adopted in August 2018.

5.5 Chipping Campden is identified as one of a series of Principal Settlements in Policy DS1 of the Local Plan. The supporting text advises that the Principal Settlements were identified as the most sustainable locations to deliver future growth, with Cirencester being the district's main centre by a very considerable margin. It also advises that the settlements were selected based on their social and economic sustainability, including accessibility to services and facilities. The availability of suitable land capable of delivering sustainable development during the Plan period also helped determine which settlements to include in the Development Strategy. Policy S16 sets out a specific development strategy for Chipping Campden

5.6 The Local Plan includes a series of other policies which affect the neighbourhood area as follows:

- Policy DS2 Development within Settlement Boundaries;
- Policy EC8 Main Town Centre Uses;
- Policy EN3 Local Green Spaces;
- Policy EN5 Cotswold Area of Outstanding Natural Beauty;
- Policy EN10 Designated Heritage Assets
- Policy EN11 Conservation Areas
- Policy EN12 Non-designated Heritage Assets

5.7 CDC is well-advanced with the preparation of a new Local Plan that will cover the period up to 2043. The most recent version of the Local Development Scheme indicates that the Plan will be submitted for its own examination in Winter 2026 and be adopted in Winter 2027.

5.8 The submitted Plan has been prepared within its wider adopted development plan context. In doing so it has relied on up-to-date information and research that has underpinned existing planning policy documents in the district. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

Visit to the Neighbourhood Area

5.8 I visited the neighbourhood area on 6 February 2026. I approached it from the Fosse Way to the east. This helped me to understand its connection to the strategic road network and its setting in the wider countryside.

5.9 On the way into the town I looked at the industrial and commercial uses around Station Road including Campden BRI and the industrial units off Battlebrook Drive.

5.10 I looked initially at the historic core of the village based around High Street. I saw the vibrancy of its retail and commercial premises. I also saw the significance of the various designated and non-designated assets in this part of the village.

5.11 I then looked at St James Church and The Church Rooms. I appreciated the historic setting and its relationship to Old Campden House.

5.12 I then looked at the various proposed local green spaces within the town, and on its edges.

5.13 I then drove to Broad Campden. I saw that it had a very different character to that of Chipping Campden.

5.14 I took the opportunity to look again at the town centre on the day of the hearing. I visited the proposed local green space at The Cley (LGS21) on that day.

6 The Neighbourhood Plan as a whole

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The Basic Conditions Statement and its Update have helped considerably in the preparation of this section of the report. They are well-presented and informative documents which are proportionate to the Plan.

6.2 As part of this process I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- not have the effect of preventing development from taking place which is proposed in the development plan for the area of the authority;
- not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

6.3 I assess the Plan against the basic conditions under the following headings.

National Planning Policies and Guidance

6.4 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in December 2024.

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6.5 The NPPF sets out a range of core land-use planning issues to underpin both plan-making and decision-taking. The following are particularly relevant to the Chipping Campden Parish Neighbourhood Plan:

- a plan-led system – in this case the relationship between the neighbourhood plan and the adopted Cotswold Local Plan;
- delivering a sufficient supply of homes;
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

6.7 In addition to the NPPF, I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.

6.8 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a positive vision for the future of the neighbourhood area. It seeks to safeguard the character and appearance of the neighbourhood area and comments on design matters. It also proposes the designation of a package of Local Green Spaces. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.

6.9 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This is reinforced in Planning Practice Guidance. Paragraph ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.

6.10 As submitted, the Plan does not fully accord with this range of practical issues. Many of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes a policy for the town centre (Policy 1). In the social dimension, it includes policies for community facilities (Policy 2), and for local green spaces (Policy 6). In the environmental dimension, the Plan positively seeks to protect its natural, built. and historic environment. It has specific policies on design (Policy 3), on non-designated heritage assets (Policy 4) and on biodiversity (Policy 5). This assessment overlaps with CCTC's comments on this matter in the submitted Basic Conditions Statement.

Not have the effect of preventing development from taking place which is proposed in the development plan for the area of the authority

6.12 I have already commented in detail on the development plan context in the District in paragraphs 5.4 to 5.8 of this report.

6.13 I consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the development plan. Whilst the Plan proposes a series of policies relating to its built and natural environment, it does not prevent the potential for new development to come forward to implement the ambitions of Policy S16 of the Local Plan. Similarly, the implementation of the Plan will not prevent the development of the more specialised housing as addressed in Policies H2-H5 of the Local Plan. In this broader context I am satisfied that the implementation of the Plan will not have the effect of preventing development from taking place which is proposed in the development plan.

Strategic Environmental Assessment

6.14 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.

6.15 In order to comply with this requirement CDC published a screening report in February 2024 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It advises that the Plan sets out a vision and planning policies to shape development in Chipping Campden up to 2031 and decision makers will need to consider the criteria of these policies when determining future applications in Chipping Campden. However, it advises that the Plan does not directly impact on land use through the allocation of sites for housing or other forms of development. On this basis, the screening report concludes that the submitted Plan is unlikely to have significant environmental effects and that full SEA is therefore not required.

Habitat Regulations

6.16 CDC prepared a Habitats Regulations Assessment (HRA) of the Plan at the same time. It is very thorough and comprehensive. The screening report does not identify any likely significant effects that will require Appropriate Assessment, either for the Plan alone or in combination with other plans or projects. The screening report concludes that an Appropriate Assessment is not required for the Plan as none of the policies will directly result in new built development and likely significant effects from the plan can therefore be ruled out.

6.17 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

Human Rights

6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no

evidence that has been submitted to me to suggest otherwise. In addition, there has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. Based on all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

6.19 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan Policies

7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.

7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.

7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and CCTC have spent time and energy in identifying the issues and objectives that they wish to be included in the Plan. This sits at the heart of the localism agenda.

7.4 The Plan has been designed to reflect Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans must address the development and use of land. Section 4 identifies a separate package of community aspirations.

7.5 I have addressed the policies in the order that they appear in the submitted Plan. The community aspirations are addressed thereafter.

7.6 For clarity this section of the report comments on all the policies in the Plan.

7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial sections of the Plan (Sections 1-4)

7.8 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies. The Introduction identifies the neighbourhood area (Figure 1), and specifies the Plan period. It also summarises the consultation undertaken and includes a Key Diagram.

7.9 Section 2 sets out a comprehensive vision for the Plan. It is very distinctive to the neighbourhood area and provide an overall context for the resulting policies. The Vision is that:

'A vibrant rural community, renowned for its creativity, culture, and commerce, as much as for the beauty of its buildings, agriculture, and natural surroundings. Our aim for the (Plan) is to foster a society working together to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents to promote wellbeing, and amenities for all visitors to the area. A beautiful natural and built environment within the Cotswolds National Landscape that provides safe and accessible housing for all residents where the historic legacy is preserved.'

7.10 Section 2 also comments about the six objectives of the Plan.

7.11 Section 3 helpfully sets out the nature of the parish and its current circumstances. It helps to underpin the approach taken in several of the policies.

7.12 Section 4 comments about community concerns and aspirations.

7.13 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy 1 – Chipping Campden Town Centre

7.14 This is a wide-ranging policy on Chipping Campden Town Centre. It has three key elements:

- proposing that the Key Centre Boundary is extended (and as shown in Figure 13);
- where planning control can be exerted, the change from residential and town centre uses to visitor accommodation will only be allowed where it can be demonstrated that there will be no harm to the vibrancy of the town centre; and
- proposals to provide extra parking at Chipping Campden School or elsewhere to alleviate congestion in the town centre will be supported.

7.15 The Plan advises that the current key centre boundary line cuts across the High Street just a few metres short of its junction with Leysbourne, and Church Street. CCTC believes this is not consistent with key centre main uses and functionality. As such the Plan proposes that the existing key centre boundary relating to Local Plan policy EC7 is modified to better reflect the real function of the High Street, as reflected in the geometry of the junctions and the existence of a key town centre use that is currently outside control of Policy EC8, but should be included within, given its importance to the community. The revised boundary is shown in Figure 13.

7.16 This policy was considered at the hearing. I saw the vibrancy and attractiveness of the town centre during the visit and on the day of the hearing.

7.17 The helpful supporting text highlights the range of issues faced by the town centre and with which the Town Centre has grappled in formulating the policy. I sought CCTC's comments on the following matters:

- the initial part of the policy has an unusual format that requires the reader to access an appendix in the Plan and then refer to a policy in the Local Plan.
- is there a degree of tension between the first and third parts of the policy about visitor accommodation as the former seeks to ensure its retention whereas the latter is much less positive about such uses?
- in the third part of the policy how does it anticipate that CDC would assess any impact of such proposals on the vibrancy of the town centre?

7.18 I have considered these matters carefully alongside CCTC's response to the clarification note. Based on the helpful discussion at the hearing, I recommend that the policy is recast so that it delivers an update local dimension to Policy EC8 of the adopted Local Plan. In summary the recommended modified policy:

- reflects the changes in the Use Classes Order since the Local Plan was adopted;
- acknowledges the Town Council's approach towards rounding off the key centre boundary;
- is intended to supplement Policy EC8 of the Local Plan in the period leading up to the adoption of the emerging Local Plan;
- retains the support for extra car parking; and
- deletes any commentary about visitor accommodation from the policy to acknowledge the legislative issues on this matter and the way in which visitor accommodation is now an integral part of the role and character of the town centre

7.19 The modified policy has regard to Sections 6, 7 and 8 of the NPPF. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with:

'Within the key centre boundary identified on the Policies Map, Class E uses will be supported where they will complement and enhance the retailing offer of the key centre. The loss of Class E uses in the key centre will not be supported where this would adversely affect the vitality and viability of the key centre entre or harm wider town centre investment, or cause amenity issues.

Where the loss of a Class E use is proposed, evidence should be submitted to demonstrate that the property has been continually, actively and effectively marketed for at least twelve months and that the use is no longer of commercial interest.

Proposals to provide extra parking at Chipping Campden School or elsewhere to alleviate congestion in the town centre will be supported.'

Policy 2 – Community Facilities and Infrastructure

7.20 The Plan advises that Chipping Campden is fortunate to have a full range of community facilities, local health services, opportunities to meet, high quality recreation for all ages, and beautiful and tranquil open spaces within the built-up areas. Table 6 and Appendix 4 list all the social and community infrastructure in the parish as the baseline of what exists and that should be protected under Local Plan policy INF2.

7.21 The policy has two parts. The first comments that the infrastructure identified in Table 6 and Appendix 4 should be used as the basis of Local Plan Policy INF2 and EC8. The second advises that the provision of suitable land for human burial will be supported.

7.22 I saw the impressive range of community facilities in the town during the visit. The proposed connection between Table 6 and Local Plan policies is a very practicable approach, and will avoid duplication of policies.

7.23 I have noted CDC's representation on the policy and CCTC's response to the representation. Taking account of all the relevant information, I recommend that the policy makes a reference only to Policy INF2 of the Local Plan. I have reached this

conclusion for two related reasons. The first is that Policy 1 of the Plan (including my recommended modifications to that policy) already addresses the importance of retail uses to good effect. The second is that the details in Policy EC8 of the Local Plan (and which overlap with the recommended modified Policy 1) are very comprehensive and there is no need for a neighbourhood plan to restate its approach.

7.24 In this context, I recommend that the reference to the grocery stores in both Table 6 and Appendix 4 are deleted and repositioned into the supporting text in the policy.

7.25 In relation to burial plots, the Plan highlights that a recent survey (March 2024) commissioned by CCTC confirmed that there were a potential additional 44 burial plots remaining. The Plan advises that new burial land is therefore required and will become urgent in time. CCTC has not identified potential sites. On this basis the second part of the policy takes a general and permissive approach.

7.26 In general terms, I am satisfied that this part of the policy takes an appropriate approach and has regard to Section 8 of the NPPF. Nevertheless, I recommend that appropriate environmental safeguards are built into the policy to bring the clarity required by the NPPF and to avoid any potential unintended consequences that may arise from its implementation in the Plan period.

7.27 I have noted the suggestions from The Campden Society about the way in which the policy could be broadened. However, an extended scope of the policy is not necessary to ensure that it meets the basic conditions. In any event matters such as bus stops and litter bins are beyond planning control

7.28 With the incorporation of the recommended modifications I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Development proposals that would affect the community infrastructure identified in Table 6 and Appendix 4 will be determined on the contents of Local Plan Policy INF2.

The development of land for human burial purposes will be supported where it safeguards the residential amenity of adjoining parcels of land.’

At the end of the section headed Objective (page 64) add:

‘Policy EC8 of the Local Plan takes a very comprehensive approach to the loss of Class A1 and other town centre related uses. On this basis grocery shops are not included in the details of Table 6 and Appendix 4. Whilst they serve a clear community purpose, they are safeguarded by a development plan policy that relates to their retail use. For clarity the community attaches a specific community benefit to the following retail uses:

- *The Co-operative*
- *Fillet and Bone*

- *The One Stop Shop*
- *Toke's*
- *Maylams'*

Delete the Shops (Groceries) heading from Table 6

Delete the Shops headings from Appendix 4

Policy 3 – Design of the Built and Natural Environment

7.29 The Plan advises that the Local Plan provides very strong control over building design for the district in general and further advice is available from the Cotswolds National Landscape Management Plan. It continues by advising neither of these important documents are specific to Chipping Campden or Broad Campden and for this reason, CCTC secured technical support to prepare the Chipping Campden Design Guide (as a supporting document to the Plan).

7.30 The Design Guide provides general advice for applicants. It provides advice on strategic design principles and on detailed design. It is an excellent example of a document of this type and brings real depth and detail to the Plan.

7.31 The policy comments that planning proposals, particularly those with Design and Access Statements, should demonstrate that they have paid regard to the Chipping Campden Design Guide and should be designed according to the Building with Nature document.

7.32 Plainly design is a key consideration in the neighbourhood area. The submitted Design Guide is very impressive and will assist the ongoing local efforts to safeguard the character and appearance of the town. The overall approach taken is a very positive approach to Section 11 of the NPPF.

7.33 I note that The Campden Society supports the policy.

7.34 In this broader context, I recommend the following modifications to the policy to bring the clarity required by the NPPF and to allow CDC to be able to apply its contents through the development management process:

- the inclusion of a proportionate element to acknowledge that minor and domestic proposals will be less affected by the principles in the Design Guide than larger proposals;
- a requirement for development proposals to respond positively to the Guide rather than simply to have regard to that document; and
- the inclusion of the missing elements within the policy (as suggested by CDC)

7.35 Otherwise the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'As appropriate to their scale, nature and location, development proposals should respond positively to the Chipping Campden Design Guide and be

designed in accordance with Natural England's Green Infrastructure Planning and Design Guide and the Building with Nature standards or equivalent.'

Policy 4 – Non-Designated Heritage Assets

7.36 Appendix 5 of the Plan provides details of the proposed non-designated heritage assets (NDHAs), and explains their local significance. It advises that some of the important features of buildings are already protected under existing legislation, national and local planning policy.

7.37 I saw the significance of the proposed NDHAs during the visit. As with Policy 2, the proposed connection between Appendix 5 and Policy EN12 of the Local Plan is a practicable way forward, and will avoid a duplication of policies.

7.38 I note that The Campden Society proposes additional non-designated heritage assets. In its response to the clarification note, CCTC advised that:

'(the) NDHA list was created following the process set out in Cotswold Local Plan Policy EN12 and associated guidance and local volunteers identified candidate assets. The Council has resolved not to make further additions during this NDP cycle because new nominations require investigation, consultation, and assessment, adding them now would require re-consultation on Policy 4, and it would jeopardise Plan delivery timescales. Further NDHA work can be taken forward after NDP adoption as part of a Local Heritage List project.'

7.39 I am satisfied that the proposed NDHAs are appropriate for the neighbourhood area and reflect the approach taken in Table 6 of the Local Plan. The approach taken has regard to Section 16 of the NPPF. In this broad context, I recommend that the opening element of the policy is modified so that it is more explicit about its relationship with Policy EN12 of the Local Plan. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the policy with:

'The Plan identifies the following features as non-designated heritage assets for the purpose of the application of Policy EN12 of the Local Plan:'

Policy 5 – Biodiversity Net Gain and Local Nature recovery

7.40 This is a wide-ranging policy. As its title suggests. it addresses both Biodiversity Net Gain (BNG) and Local Nature recovery.

7.41 The policy element on BNG is general in nature. The element on the Local Nature Recovery Strategy (LNRS) is more specific. It advises that land identified in Table 7, Figure 16 and Appendix 6 is designated as the Chipping Campden Local Nature Recovery Areas for inclusion in the Gloucestershire Local Nature Recovery Map under provisions of the Environment Act 2021.

7.42 I note the approach taken in the supporting text and the wider ambitions of CCTC to dovetail the contents of the Plan into the work being undertaken by Gloucestershire

County Council and the Gloucestershire Wildlife Trust to prepare a Local Nature Recovery Strategy (LNRS). Nevertheless, I sought commentary from CCTC about the extent to which is it appropriate and/or lawful for a neighbourhood plan to propose Local Nature Recovery Areas. In its response to the clarification note CCTC commented that:

'(it) recognises that the statutory Local Nature Recovery Strategy (LNRS) will be prepared by Gloucestershire County Council as the responsible authority. The intention is not to create statutory Local Nature Recovery Areas, but to

- *identify areas within the parish that, based on locally-held habitat evidence (Appendix 2), have potential to contribute to nature recovery*
- *ensure local ecological priorities are set out transparently*
- *guide developers when identifying appropriate off-site BNG locations consistent with national policy's 'onsite first, local offsite second' structure.*

The areas shown are aspirational, non-statutory indicators, to be considered alongside, and ultimately superseded by, the Gloucestershire LNRS when published. The Plan wording could, if necessary, be modified to make this explicitly clear, such as renaming to Areas of Potential Local Nature Recovery (or similar).

7.43 In addition, I sought CCTC's advice about the what extent have the owners of the proposed Local Nature Recovery Areas been engaged in the Plan preparation process. In its response to the clarification note, CCTC commented that:

'engagement has taken place through the Regulation 4 consultation, during which all affected landowners were contacted and invited to comment, direct correspondence with several landowners who are supportive of biodiversity improvements….Where landowners have objected, this is explicitly acknowledged, and the policy does not apply designations or constraints to land. It purely identifies opportunities.'

7.44 Criteria a-e read as process issues rather than as land use policy matters. I sought advice from CCTC about its approach to this matter and the extent to which the criteria would bring any distinctive neighbourhood area value beyond the content of existing national and local planning policies relating to biodiversity net gain. In its response to the clarification note CCTC commented that:

'the criteria in Policy 5 are intended to

- *provide a clear, locally-specific decision-making sequence for developers seeking to meet statutory BNG requirements*
- *ensure that BNG delivery aligns with both national requirements and local evidence*
- *support the NPPF expectation that strategic ecology networks and local priorities be taken into account*
- *prevent ad-hoc or poorly targeted off-site BNG contributions.*

While BNG requirements originate in national legislation, the criteria add the following locally distinctive value

- *referencing locally mapped priority habitats*
- *supporting parish-level delivery of BNG where possible*
- *preventing loss of opportunity for ecological connectivity through isolated or remote off-site solutions.*

The town council would be open to separating the first part of the policy, LNRAs (or Areas of Potential Local Nature Recovery), from the BNG part of the policy.'

7.45 I have considered these comments very carefully alongside the representation from CDC and SF Planning (on the LNRS issue). In general terms I am satisfied that the element of the policy on biodiversity net gain has regard to Section 15 of the NPPF. However, in this context I recommend the following modifications to this element of the policy to bring the clarity required by the NPPF and to allow CDC to implement it through the development management process:

- a rationalisation of the overlapping criteria;
- the removal of unnecessary supporting text from within the policy; and
- the relocation of the third part of the policy into the supporting text.

7.46 I also recommend modifications to the supporting text based on the comments from CDC and Gloucestershire County Council (GCC) (both in its initial representation and in its comments on the revised Basic Conditions Statement).

7.47 On the LNRS part of the policy I have noted CCTC's response to the clarification note on its intentions for the policy. It highlights that the responsibility for the preparation of a LNRS rests with GCC. In these circumstances I recommend that this part of the policy is deleted, and that the supporting text is consolidated. I also recommend that the extent of the proposed site 11 for local nature recovery is modified where it does not have the support of the landowner.

7.48 For clarity I am satisfied that the retained element of the policy (on biodiversity net gain) refers to the Gloucestershire LNRS. It is perfectly appropriate for a neighbourhood plan to signpost developers to a policy or strategy prepared by another organisation which affects the neighbourhood area

7.49 Otherwise the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'Proposals that are required to provide biodiversity net gain should demonstrate that those requirements have been fully addressed as follows:

- **by ensuring any relevant overlap with Gloucestershire Local Nature Recovery Strategy regarding the proposal site, including its relationship with the Gloucestershire Local Nature Recovery map; and**

- **ensuring that long-term biodiversity net gains will be delivered with enduring benefits, and with long-term management arrangements where necessary.**

Wherever practicable, biodiversity net gain should be delivered on the development site. Where this is not practicable, a sequential approach to off-site delivery will be applied as follows:

- **within the Chipping Campden Local Nature Recovery Areas; or**
- **if this is not practicable, elsewhere within Chipping Campden Parish; or**
- **if neither of the above is practicable, in locations that contribute to the Gloucestershire Local Nature Recovery Strategy.**

Proposals should only deliver biodiversity net gain outside the three areas listed above where it can be clearly demonstrated that none of the listed options are practicable.'

Replace the third paragraph of text on page 77 with:

'The CCNDP used supporting evidence obtained from the Gloucestershire Environmental Records Centre to map habitats (see Appendix 2). The working party identified areas of the parish which present an opportunity to function as locations for achieving nature recovery and improvement (see Figure 16 and Appendix 6). The following types of opportunity are available in the Parish:'

Replace the final paragraph of text on page 77 with:

'The CCNDP acknowledges that the County Council is responsible for preparing the Local Nature Recovery Strategy (LNRS). Within this context Figure 16 identifies areas which could be optimum locations within the parish to deliver nature recovery and improvement, because either they are already important for biodiversity in their own right, provide ecological connectivity or have good potential to increase in biodiversity value or connectivity. These are based on data provided by the Gloucestershire Environmental Records Centre. It is acknowledged that the report (published in 2017) relies on data from that time and more recent data will be available, but it is considered to remain a realistic and credible representation of nature recovery and improvement potential in the area. Planning proposals should demonstrate that landowners of sites where biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery.'

Delete the part of the Local Nature Recovery Area (site 11) within Springhill Industrial Estate as shown on Figure 16 and in Appendix 6.

Policy 6 – Local Green Spaces

7.50 The Plan proposes the designation of a package of local green spaces (LGSs). The approach taken is underpinned by the details in Appendix 7. The combination of a map and photographs for each proposed LGS is best practice.

7.51 I have noted the strength of the community support for the proposed package of LGSs.

7.52 In terms of the information in Appendix 7 I sought CCTC's comments on the following matters:

- the sizes of LGSs 11/17/19/20/21/22;
- the process that was followed to engage with the owners of proposed LGSs and how the details relate to the information contained in the Consultation Statement on this matter; and
- whether any assessment was undertaken on the extent to which the proposed LGSs are already protected by other factors/designations and the other matters set out in Planning practice guidance (ID: 37-011, 37-015, 37-017 and 37-018).

7.53 Where appropriate CCTC's responses to these matters is incorporated in this report. This report also takes account of the very detailed responses from CCTC to the representations received on the proposed LGSs.

7.54 The hearing identified that CCTC had relied on Tool Kit information as part of its consideration of the extent to which the parcels of land concerned met the various criteria for LGS designation in paragraphs 106 and 107 of the NPPF. Following the hearing CCTC shared its work on the Tool Kit assessments with the hearing participants and CDC invited comments from the other participants. Where appropriate, the information received is incorporated in this report.

The proposed LGSs

7.55 I looked carefully at the proposed LGSs during the visit. I noted their various sizes, land uses, and locations. I am satisfied that most of the proposed LGSs meet the requirements of paragraphs 106 and 107 of the NPPF. In many cases, they contribute to the attractive environment of both Chipping Campden and Broad Campden. In their different ways proposed LGSs 14 (Ernest Wilson Garden), 15 (Wold's End Orchard), and 17 (Calf Meadow) are precisely the types of green space that the authors of the NPPF would have had in mind for such designations.

7.56 Detailed objections have been made about the proposed designation of LGSs 19 (The Hoo West), 20 (The Hoo East), 21 (The Cley) and 22 (The Craves). The four proposed LGSs were considered at the hearing on 14 April 2026. I address these proposed designations in turn in the next sections of this report and assess each of the four proposed LGSs against the relevant criteria in paragraphs 106 and 107 of the NPPF and the more general issues in Planning practice guidance.

LGS19 The Hoo West

7.57 Appendix 7 of the Plan advises that this proposed LGS is an essential part of the rural environment within which the Town is set, and which gives the Town its specific character. It also comments that the CDC Green Infrastructure August 2017 identifies that the setting of the town is important to the whole of its aesthetics uniquely in that the built environment remains generally hidden in the folds of the landscape. The Cotswold Way runs up Hoo Lane from the centre of the town, and public footpath runs up Hoo Lane to the east and north east of the site and overlooks the site. Other public footpaths cross the site. The site is mostly open pasture. The footpaths are used for walking, running, and dog walking.

7.58 I saw these details first-hand during the visit to the neighbourhood area on 6 February 2026.

7.59 The agent acting for the owner of the proposed LGS comments that:

'In regard to being demonstrably special or holding particular local significance, the land identified as LGS19 forms part of the open countryside that surrounds the market town of Chipping Campden; a network of agricultural fields. This wider surrounding landscape is already protected for its scenic beauty through designation as a Natural Landscape (the Cotswolds National Landscape) (formerly AONB). The settlement of Chipping Campden and surrounding countryside is washed over by this national designation. The importance of this land as local green space has been overstated in my opinion in an attempt to block areas considered under threat from future development. This restrictive (rather than positive) planning strategy is wholly inappropriate and contrary to local strategic policies for growth and national planning policy.'

7.60 I am satisfied that this proposed LGS is in reasonably close proximity to the community it serves. It is immediately adjacent to the town

7.61 I am also satisfied that the proposed LGS is demonstrably special to a local community and holds a particular local significance. It plays an important role in the setting of the town and is attractive countryside.

7.62 The proposed LGS is 15.3 hectares in size. Based on all the evidence and my own observations, I am not satisfied that it is local in character. Whilst Planning practice guidance does not identify any specific maximum size threshold for a LGS I have concluded that the proposed LGS is an extensive tract of land. This reinforces its location in the countryside surrounding the town.

7.63 I have carefully considered the extent to which the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape. Based on all the evidence I am not satisfied that this is the case. It is an integral part of the landscape which surrounds the town and enjoys the protection afforded by national policy for National Landscapes.

7.64 In all the circumstances I recommend the deletion of the proposed LGS. Whilst it meets several of the criteria for LGS designation I am not satisfied that it is local in character. Furthermore, I am not satisfied that its designation would bring additional local benefit to the location of the site in the Cotswold National Landscape.

LGS20 The Hoo East

7.65 Appendix 7 of the Plan advises that this proposed LGS is a key part of the natural setting of the Town, is extensively walked (a footpath runs through it) and is part of the wildlife corridor from The Cley westwards. It also comments that The Hoo provides the skyline views looking north-west from most of the town and is also highly visible from approaches to the town. It is a key part of the green landscape within which the town nestles and includes ridge and furrow features which illustrate the agricultural history

of the town. It is visible from National Footpaths such as the Cotswold Way and the Monarch's Way.

7.66 I saw these details first-hand during the visit to the neighbourhood area on 6 February 2026.

7.67 The Agent acting for the owner of the proposed LGSs comments that:

'At the Regulation 14 stage, our client submitted clear, evidence-based objections to these designations. These concerns were acknowledged by the Neighbourhood Plan Group's own consultant, who described the evidence as "compelling" and recommended the removal of the sites. It's also suggested that the Local Planning Authority objected to LGS20 on the basis that it constitutes an extensive tract of land, contrary to the NPPF.

Despite this, the sites have not been removed. Instead, the Neighbourhood Plan continues to rely on inaccurate landownership data, insufficient evidence, and unsubstantiated claims of community value. No meaningful effort has been made to address the issues raised—either with the landowner or the Local Planning Authority—nor has there been compliance with the procedural expectation of genuine stakeholder engagement.

In planning terms, both sites fail to meet the tests for Local Green Space designation set out in Paragraphs 105 107 of the NPPF. The designation appears to serve no clear purpose beyond restricting future development, contrary to the requirement that such designations support sustainable development and complement investment in homes, jobs, and services (Paragraph 106 of the NPPF).

Given these factors and the absence of any demonstrable local significance for these sites, their continued inclusion as Local Green Spaces is not justified and would result in an unsound approach to Local Green Space Policy that would not stand up to scrutiny over the course of the current development plan period.'

7.68 I am satisfied that this proposed LGS is in reasonably close proximity to the community it serves. It is immediately adjacent to the town. Its accessibility is reinforced by the well-used footpaths throughout its area.

7.69 I am also satisfied that the proposed LGS is demonstrably special to a local community and holds a particular local significance. It plays an important role in the setting of the town and is attractive countryside.

7.70 The proposed LGS is 17.8 hectares in size. Whilst Planning practice guidance does not identify any specific maximum size threshold for a LGS I have concluded that the proposed LGS is an extensive tract of land. This reinforces its location in the countryside surrounding the town.

7.71 I have carefully considered the extent to which the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape. Based on all the evidence I am not satisfied that this is the case. It is an integral part of the

landscape which surrounds the town and enjoys the protection afforded by national policy for National Landscapes.

7.72 In all the circumstances I recommend the deletion of the proposed LGS. Whilst it meets several of the criteria for LGS designation I am not satisfied that it is local in character. Furthermore, I am not satisfied that its designation would bring additional local benefit to the location of the site in the Cotswold National Landscape.

LGS 21 The Cley

7.73 Appendix 7 of the Plan advises that this proposed LGS is an area of natural pasture and wild woodland, the last in the area, which occupies an elevated position. It is a notable feature on the approach to the town, providing a backdrop. It is visible to the public from the Aston Road and from the well-used footpath along the northern boundary of the site, which connects the Aston Road to the Cotswold Way National Trail. It also advises that the land is home to an extremely wide variety of wildlife including hares, rabbits, moles, fieldmice, muntjac deer, roe deer, foxes, badgers and a wide variety of birds, some of them rare species.

7.74 I saw these details from the footpaths surrounding the site during the visit to the neighbourhood area on 6 February 2026.

7.75 An unaccompanied visit into the site was arranged for me during the hearing that took place on 14 April 2026.

7.76 I am satisfied that this proposed LGS is in reasonably close proximity to the community it serves. It is immediately adjacent to the built form of the town.

7.77 Appendix 7 comments generally on the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance. CCTC submitted its toolkit analysis after the hearing. On this issue it comments as follows:

'*The character of Chipping Campden is to a large extent defined by its history, evidenced for instance by historic buildings and sites such as Old Campden House and Gardens, and its rural setting which tells the story and provides a physical link with its agricultural past. Sites such as the Cley are essential elements of the rural setting. The Cley is the last surviving unspoilt woodland in the town; it is also the last piece in the jigsaw of the circular paths around the town, being a green strip adjoining the footpath leading down from the Hoo to Aston Road. DEFRA specifically categorises the site as Priority Habitat Inventory Deciduous Woodland with regard to biodiversity and habitats. In addition, it is in an area categorised as Environmentally Sensitive and is included in the Ground Water Vulnerability Map,'*

7.78 Following the hearing, the agent acting for the owner of the site provided a package of information about the work it is undertaking on a Woodland Management Plan for the site and which is being pursued with the Forestry Commission as follows:

'*The Woodland Management Plan identifies widespread woodland degradation, including significant Ash Dieback, unmanaged scrub growth, declining tree health, structural instability, and risks associated with trees adjoining residential property and third-party land. Importantly, substantial felling operations have been recommended across the majority of the woodland compartments as part of good and necessary woodland management.*

The evidence base supporting LGS21 places substantial reliance upon:

- *the quality and amenity value of the woodland;*
- *the ecological significance of the site;*
- *the contribution of the tree stock to the setting of the town.*

However, the professional woodland management evidence now before the Examiner demonstrates that:

- *large parts of the woodland are in declining condition;*
- *substantial felling is considered necessary as part of responsible woodland management;*
- *significant proportions of the existing tree stock are affected by Ash Dieback or structural decline; and*
- *active intervention is required to secure the long-term future and resilience of the woodland.*

That evidence sits uneasily alongside the suggestion within the Neighbourhood Plan evidence base that the site comprises a uniformly high-quality woodland resource of exceptional local significance.

This does not diminish the value of the woodland generally; however, it does demonstrate that the condition, composition, and quality of the woodland is materially more complex and dynamic than suggested within the Local Green Space assessment.'

7.79 I noted carefully the location and condition of the trees on the site during the visit in April 2026. On the balance of the evidence, I am not satisfied that CCTC has made a compelling case that the proposed LGS is demonstrably special. The Tree Preservation Order on the site is of a general nature rather than specific to individual trees. Furthermore, there is clear evidence that management of the woodland is necessary to secure its longer-term future and well-being.

7.80 The proposed LGS is 2.17 hectares in size. Based on all the evidence I am satisfied that the proposed LGS is local in character and not an extensive parcel of land. Whilst it is slightly larger than most of the other proposed LGSs within the built-up part of the town its size and character are local. Moreover, its size is considerably smaller than proposed LGS 19 and 20 which I have concluded are large tracts of land.

7.81 I have also considered carefully the way in which the proposed designation would comply with the requirements of paragraph 106 of the NPPF. I am satisfied that its designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. In

the broader context of CDC's preparation of a new Local Plan I note that the site was considered as part of the Site Assessment process in 2021 (as site CC64) and was discounted as the whole of the site is covered by a Tree Preservation Order.

7.82 I have carefully considered the extent to which the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape. On the one hand, I noted that the proposed LGS has a different and more enclosed character to that of the adjacent proposed LGS 20 (The Hoo East). On the other hand, I saw from both visits that it formed part of the wider landscape beyond the built-up form of the town. On the balance of all the evidence I am not satisfied that the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape.

7.83 In all the circumstances I recommend the deletion of the proposed LGS. Whilst it meets several of the criteria for LGS designation, I am not satisfied that meets the demonstrably special element of paragraph 107 of the NPPF. Furthermore, I am not satisfied that its designation would bring additional local benefit to the location of the site in the Cotswold National Landscape.

LGS22 The Craves

7.84 Appendix 7 of the Plan advises that this proposed LGS is integral to the town's identity. It has been a valued green space for centuries, with three well used public footpaths and is a unique remnant of the separation of the Norman new town of Campden from the distinct and earlier settlement of Westington. It is a sloping field and from its high point walkers can see views over the town. The sloping site is also visible from within the town and provides a green backdrop to the historic buildings, which is a special feature not seen elsewhere. The town uses it for walking and dog walking – and paddling in the River Cam.

7.85 I saw these details first-hand during the visit to the neighbourhood area on 6 February 2026. I noted the importance of the footpaths within the site and the way in which they connected with the built-up parts of the town surrounding the proposed LGS.

7.86 The agent acting for the owner of the proposed LGS comments that:

'Contrary to the views expressed in the LGS assessment (Appendix 6, Reg 15 version CCNDP), draft designation LGS22 does not meet the criteria set out under Paragraph 107. As such, the designation of this land as LGS would be contrary to national planning policy.

It is accepted that a footpath crosses the field (Footpath 15) and there are two headland footpaths that run partially along the northern (Footpath 14) and southern (Footpath 16) boundaries, but this is not reason enough for this land to be of particular importance or demonstrably special. The NPPG is clear that "Areas that may be considered for designation as Local Green Space may be crossed by public rights of way. There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation." (Paragraph: 018 Reference ID: 37-018-20140306: Revision date: 06 03 2014).

In addition, the NPPG states "There are no hard and fast rules about how big a Local Green Space can be because places are different, and a degree of judgment will inevitably be needed. The total area of the field known as the Craves amounts to 7 acres. When considered against the immediate local context this amounts to an area of considerable size, a large area or extensive tract of land which would fail to comply with the designation criteria set out in Paragraph 107 of the NPPF. Although this land lies within the form of the settlement and not adjacent to the settlement where a LGS designation might be likened to a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.' [Paragraph: 015 Reference ID: 37 015-20140306; Revision date: 06 03 2014]. Equally, a blanket designation of the land known as the Craves would not be consistent with or appropriate as a 'back door' approach to protect this land from future development or as a strategic gap by any other name.'

7.87 I have carefully considered this proposed LGS. It is an unusual LGS to the extent that it is a parcel of agricultural land within the built-up part of the town. Nevertheless, national legislation is clear that LGSs can come forward in a variety of circumstances.

7.88 I am satisfied that this proposed LGS is in reasonably close proximity to the community it serves. Indeed, it is set within the built-up part of the town. Its accessibility is reinforced by the well-used footpaths throughout its area.

7.89 I am satisfied that the proposed LGS is demonstrably special to a local community and holds a particular local significance. As the Plan comments it has been a valued green space for centuries, with three well used public footpaths and is a unique remnant of the separation of the Norman new town of Campden from the distinct and earlier settlement of Westington. It also provides a green backdrop to the historic buildings, which is a special feature not seen elsewhere.

7.90 The proposed LGS is 3.21 hectares in size. Based on all the evidence, I am satisfied that the proposed LGS is local in character and not an extensive parcel of land. Whilst it is slightly larger than most of the other proposed LGSs within the built-up part of the town, its size and character are local. Moreover, its size is considerably smaller than LGS 19 and 20 which I have concluded are large tracts of land.

7.91 I have also considered carefully the way in which the proposed designation would comply with the requirements of paragraph 106 of the NPPF. I am satisfied that its designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. In the broader context of CDC's preparation of a new Local Plan I note that the site was considered as part of the Site Assessment process in 2021 (as site CC58) and was discounted for the following reasons:

'Unsuitable for housing or commercial development – this is a highly sensitive site within the Conservation Area and the AONB. The site also forms part of the setting of a large number of Grade II Listed Buildings and is a green lung within the town. Flood Zones 3b, 3a and 2 (SFRA Level 2) extend within the northern boundary. A Public Right of Way also runs through centre of site and along northern and southern boundaries. The access onto Blind Lane is also likely to be problematic.'

7.92 I am also satisfied that the proposed LGS is capable of enduring beyond the end of the Plan period and there is no evidence to suggest otherwise.

7.93 I have carefully considered the extent to which the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape. Based on all the evidence, I am satisfied that this is the case. LGS designation would identify the special characteristics of the site, including the way in which it provides a setting for several heritage assets and includes well-used footpaths.

7.94 In conclusion I am satisfied that the proposed LGS meets the basic conditions.

The Policy Wording

7.95 The policy takes a simple format and merely lists the proposed LGSs. The information in the box in the supporting text draws attention to national policy on this matter in the NPPF. Whilst the implication of LGS designation may be clear to planning professionals, it is not set out in the policy. I recommend a modification to address this matter.

7.96 With this modification to the policy wording and the deletion of the three LGSs I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Delete proposed LGSs 19, 20 and 21 from the list in the policy.

Add as a separate element at the end of the policy 'Development proposals within the designated local green spaces will only be supported in very special circumstances.'

Remove proposed LGSs 19, 20 and 21 from Figure 17

Community Aspirations

7.97 Section 4 of the Plan identifies the following community aspirations:

- Better town centre parking;
- Railway Station;
- Campden BRI, Campden Business Park, and start-up industries
- Replacement Primary School;
- Health Centre; and
- Indoor Sports Facility.

7.98 These matters are properly addressed in a separate part of the Plan from the land use policies. This is best practice. In addition, I am satisfied that the community aspirations are appropriate to be included in the Plan and are locally-distinctive to the neighbourhood area.

Monitoring and Review

7.99 The Plan addresses the way in which it will be monitored and review in a positive fashion. This is best practice. It comments generally about the potential significance of

the adoption of the emerging Local Plan. In this context I recommend that the commentary is more specific about the way in which CCTC will respond at that time.

Replace the commentary on page 8 (under the Neighbourhood Plan period heading) with:

'The CCNDP supports policies in the Cotswold District Local Plan 2011 – 2031. The CCNDP period relates to that for the Local Plan and covers the period to 2031. Where Local Plan policies change some of the policies in this CCNDP may become out of date and a review of the NDP would be justified. In this context the Town Council will consider the need for a full or partial review of the Plan within six months of the adoption of a new Local Plan for the District.'

Other Matters - General

7.100 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. It will be appropriate for CDC and CCTC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies.

Other Matters – Specific

7.101 CDC has made detailed comments on the Plan. They have been very helpful as part of the wider examination process. Where they relate directly to specific policies, I have considered them in my assessment on a policy-by-policy basis. CDC has also made a series of more general comments on the wording used in the Plan. I recommend the following modifications to address these matters:

- Page 15 and beyond – replace 'Cotswold Area of Outstanding Natural Beauty with Cotswold National Landscape'
- Include numbers in the headings to the various sections of the Plan to correspond with the numbering in the Contents page

7.102 Some representations to the Plan proposed additional policies or site allocations. Whilst I have considered their details carefully, my role is to examine the Plan as submitted rather than to propose additional policies or a revised Plan. It is on this basis that this report has not directly addressed these representations.

8 Summary and Conclusions

Summary

8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2031. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to extend the key centre boundary, to safeguard the character of the neighbourhood area and to designate Local Green Spaces.

8.2 Following the independent examination of the Plan, I have concluded that the submitted Chipping Campden Parish Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

8.3 Based on the findings in this report I recommend to Cotswold District Council that subject to the incorporation of the modifications set out in this report the Chipping Campden Parish Neighbourhood Development Plan should proceed to referendum.

Referendum Area

8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the District Council on 14 February 2014.

8.5 I am grateful to everyone who has contributed to the examination. The Town Council's responses to the clarification note were both helpful and timely and the hearing was conducted in an open way.

Andrew Ashcroft
Independent Examiner
25 June 2026

Appendix A

Chipping Campden Parish Neighbourhood Development

Detailed Hearing Note

Context

This note clarifies the next stages of the examination process and expands on the earlier note about the need for a hearing.

The examination of the submitted Plan is proceeding well. I have visited the neighbourhood area, read the submitted documents and the representations made to the Plan. I have also prepared a clarification note and read the responses to that note.

Hearing

I am satisfied that most of the Plan can be examined by way of written representations. However, in accordance with paragraph 9(3) of Schedule 4B to the Town and Country Planning Act 1990, I have concluded that to ensure an adequate examination of the Plan it is necessary to hold a hearing on the contents of Policies 1 and 6 of the submitted Plan.

Hearing Details

The hearing details are as follows:

Date: Tuesday 14 April 2026
Time: 10.30 am
Venue: Town Hall, High Street, Chipping Campden GL55 6HB

The issues and the participants

The Issues

The hearing will address two issues.

The first is the Plan's proposal in Policy 6 to designate the following local green spaces:

- The Hoo West (LGS19);
- The Hoo East (LGS20);
- The Cley (LGS21); and
- The Craves (LGS22).

The second is the Plan's proposal in Policy 1 to extend the Chipping Campden Key Centre boundary.

The Participants

Chipping Campden Town Council (CCTC) and Cotswold District Council (CDC) have a statutory role at the hearing.

The private sector organisations listed below have been invited to attend the hearing:

- Morgan Elliot Planning (on proposed Local Green Spaces 20 and 21); and
- Brodie Planning Associates (on proposed Local Green Spaces 19 and 22).

The public and other interested parties will be able to attend the hearing. However, only the organisations invited to attend will be able to participate on the day.

There will be breaks throughout the day and with a slightly longer break at lunchtime. I anticipate that the hearing will finish around 4.30pm.

The hearing sessions

Session 1: The extent to which the Town Council has addressed the additional benefit of the relevant proposed local green space designations beyond the location of the sites concerned in the Cotswolds National Landscape.

This session will address the extent to which the proposed local green space (LGS) designations have regard to Planning practice guidance (ID: 37-011-20140306).

The participants for this session will be CCTC, CDC, Morgan Elliot Planning, and Brodie Planning Associates.

Session 2: Proposed LGS 20 The Hoo East

This session will address the following matters:

- the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance (NPPF 107b);
- the extent to which the proposed LGS is local in character and is not an extensive tract of land (NPPF 107c);
- the extent to which the proposed designation has regard to Planning practice guidance ID: 37-017-20140306 (on public access), and ID: 37-018-20140306 (on public rights of way);
- the extent to which the proposed designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services (NPPF106); and
- the extent to which the proposed designation is capable of enduring beyond the end of the Plan period (NPPF 106).

The participants for this session will be CCTC, CDC and Morgan Elliot Planning.

Session 3: Proposed LGS 21 The Cley

This session will address the following matters:

- the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance (NPPF 107b);
- the extent to which the proposed LGS is local in character and is not an extensive tract of land (NPPF 107c);

- the extent to which the proposed designation has regard to Planning practice guidance ID: 37-017-20140306 (on public access), and ID: 37-018-20140306 (on public rights of way);
- the extent to which the proposed designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services (NPPF106); and
- the extent to which the proposed designation is capable of enduring beyond the end of the Plan period (NPPF 106).

The participants for this session will be CCTC, CDC and Morgan Elliot Planning.

Session 4: Proposed LGS 19 The Hoo West

This session will address the following matters:

- the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance (NPPF 107b);
- the extent to which the proposed LGS is local in character and is not an extensive tract of land (NPPF 107c);
- the extent to which the proposed designation has regard to Planning practice guidance ID: 37-017-20140306 (on public access), and ID: 37-018-20140306 (on public rights of way);
- the extent to which the proposed designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services (NPPF106); and
- the extent to which the proposed designation is capable of enduring beyond the end of the Plan period (NPPF 106).

The participants for this session will be CCTC, CDC and Brodie Planning Associates.

Session 5: Proposed LGS The Craves

This session will address the following matters:

- the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance (NPPF 107b);
- the extent to which the proposed LGS is local in character and is not an extensive tract of land (NPPF 107c);
- the extent to which the proposed designation has regard to Planning practice guidance ID: 37-017-20140306 (on public access), and ID: 37-018-20140306 (on public rights of way);
- the extent to which the proposed designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services (NPPF106); and
- the extent to which the proposed designation is capable of enduring beyond the end of the Plan period (NPPF 106).

The participants for this session will be CCTC, CDC and Brodie Planning Associates.

Session 6: The proposed extension of the Chipping Campden Key Centre Boundary

This session will address the following matters:

- the extent to which the proposed extension of the key centre boundary is based on appropriate evidence; and
- if there is a case to extend the boundary, how should the policy be worded so that it relates to the general principles and approach set out in Policy EC8 of the adopted Cotswold District Local Plan.

The participants for this session will be CCTC and CDC.

Other Matters

The Arrangements for the Hearing

The hearing will address the matters above in turn. I will ask the various questions and lead any further discussion on the issues.

The details in the Plan and the representations made by the various parties are thorough and comprehensive. As such hearing statements are not required.

The Next Steps after the hearing

I will finalise my report on the Plan as soon as possible after the hearing. The parts of the report which are unaffected by the hearing will have been completed by 14 April.

The Examination Report

The hearing introduces an additional stage into the examination process. It does not affect the way in which the report will be produced and finalised. I will send a fact check report to the District Council and the Town Council (as set out in the note on examination arrangements). The main findings of the hearing will be incorporated within the report on a policy-by-policy basis. The final report will be published once the fact-checking process has concluded.

Andrew Ashcroft

Independent Examiner

Chipping Campden Parish NDP

13 March 2026 (Examiner's Note – this is the date of the hearing note, and not the date of the final report)

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